- RECORD #856 DETAIL

First Name :	Council Member William
Last Name :	Campos
Business Name :	Prince George's County Council
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	W-I-L-L-I-A-M, Campos, C-A-M-P-O-S. Good morning. I'm Prince George's County Councilman Will Campos. It's a pleasure to have you all here. For the sake of time, I'm going to be brief and just echo the comments that my colleagues the good Mayors have said. Very, very quickly though, I happen to represent the area where two of the stations could potentially be going in the Langley Park region and immediately adjacent to Tacoma Park and Montgomery County. So if you need evidence, I'll be more than happy to show you why it is that a Purple Line is much needed. I can show you that starting at 6:30 in the morning every day coming outside my District near the Beltway going toward Montgomery County. As soon as you get past the 95 split from New Hampshire Avenue all the way down past Georgia Avenue, I can show you exactly why it is that both Montgomery County and Prince George's County, and the DC Metro region for that matter, could benefit from a Purple Line. And if you still need further evidence, I will show you once again starting at 2:00 coming from Wisconsin Avenue on down. It is very self-evident that, may I say also that we are in favor of a Rail System, not the Purple Bus. So I know that's one of the things that are being proposed as well, potentially. But we wanted to make sure that we have a nice subway system serving our area. But, like I said, it's self-evident we are very supportive and we appreciate all the efforts that you are doing. And once again, just for the sake of brevity, I just want to echo the comments of my colleagues on serving the municipalities. Thank you.

- RECORD #1325 DETAIL

First Name :	Council Member George
Last Name :	Leventhal
Business Name :	Montgomery County Council
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : Good evening. I am George Leventhal, G-E-O-R-G-E, L-E-V-E-N-T-H-A-L. Montgomery County Council Member-at-Large.

Increased convenience and improved quality of life. Reduced commute times. Alternatives to the automobile. A way to get out of traffic. Access to jobs, shopping, entertainment and education. Decrease greenhouse gas omissions. Less dependance on imported petroleum. Closer links to our great research university, the University of Maryland at College Park. A direct connection between both branches of the Red Line, the green line, the orange line, three MARC train lines and Amtrak. Protection, enhancement and completion of the Capitol Crescent Trail. Transit oriented economic development. Smart Growth and community revitalization inside the beltway.

What other public investment now underway provides so many benefits for the citizens of Montgomery and Prince George's counties? We need the Purple Line now. We need to recognize the stiff competition we will face from other parts of the county that are also seeking federal approval for transit projects. We can't afford to take for granted that there will be a Purple Line.

Despite the options under study and the Draft Environmental Impact Statement, the real choice that confronts us is not between rail and bus or between an at grade system versus an underground system. Because the competition is so stiff, our choice is between cost effective light rail and no transit improvement at all. We must unify Montgomery and Prince George's counties, our congressional
18 delegation, our state senators -- and state delegates, county executives and county counsels. We
must speak with a single voice and make it clear that we want the Purple Line. Because if we don't, we will end up with nothing at all.

And what would that mean? With no transit improvement travel times between Silver Spring and Bethesda will increase from the current 20 minutes to 35 minutes by 2030. Between Bethesda and College Park, from the current 49 minutes to 81 minutes. Traffic congestion, air pollution and greenhouse gas omissions will all get worse. However, medium investment, light rail will make travel times considerably better in 2030 than they are today. From Silver Spring to Bethesda, only 9 minutes. From Bethesda to College Park, only 34 minutes. With concomitant improvements in energy use and greenhouse gas reduction.

I want to thank governor Martin O'Malley, Secretary of Transportation John Porcari, Maryland Transit Administrator Paul Weidefeld, project manager Mike Madden and all the staff who have worked so hard to get us this close to realizing this vision.

Mike Madden and his team have held hundreds of community meetings and listened carefully to concerns over alignments, design elements, buffering, landscaping, noise, placement of the trail and many other issues. The DEIS is much better as a result of all the input they have received and the state's preferred final alternative will be even better as a result of the testimony they are hearing this month. Legitimate concerns of neighborhoods and trail users are being addressed.

Even as we respond to these important but relatively narrow issues, we must keep the big picture in mind. We can not allow valid concerns over details that can be relatively easily addressed to convey a message that we don't actually support the vision that the Purple Line represents.

A vision of improved mobility, a cleaner environment, invigorated

walkable communities and a beautiful, safe hiker/biker trail. We must not permit a cacophony of disparate voices to suggest that our region doesn't really know what it wants.

We may not have unanimity of opinion, in public policy unanimity is very rare. But I believe there is a clear, strong, and growing consensus in Montgomery County behind light rail on the Master Plan Alignment. Based upon the input I have received throughout my years in community activism and elected office, I believe that my constituents overwhelmingly want the Purple Line. They want it to be light rail. Because they perceive that as a higher quality commuting experience than bus transit.

With a new president taking office in January, Barack Obama committed to federal investments and infrastructure to stimulate our lagging economy, 2009 will be an extraordinarily opportune time to ask for what we want and the stronger consensus we have around our preferred option, the better our chances of winning federal funds.

If we ask for what we don't want, we might get it. And if we aren't clear about w hat we are asking for, we might get nothing at all.

- RECORD #2212 DETAIL

First Name :	Council Member George
Last Name :	Leventhal
Business Name :	Montgomery County Council
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	
Attachments :	Wrttn Sttmnt.G.L. Leventhal.pdf (2 mb)

MONTGOMERY COUNTY COUNCIL
ROCKVILLE, MARYLAND

GEORGE LEVENTHAL
COUNCILMEMBER
AT-LARGE

STATEMENT OF GEORGE L. LEVENTHAL,

MONTGOMERY COUNTY COUNCILMEMBER, AT-LARGE

BEFORE THE MARYLAND TRANSIT ADMINISTRATION

November 18, 2008

- Increased convenience and improved quality of life.
- Reduced commute times.
- Alternatives to the automobile. A way to get out of traffic.
- Access to jobs, shopping, entertainment and education.
- Decreased greenhouse gas emissions.
- Less dependence on imported petroleum.
- Closer links to our great research university, the University of Maryland at College Park.
- A direct connection between both branches of the Red Line, the Green Line, the Orange Line, three MARC train lines, and AMTRAK
- Protection, enhancement and completion of the Capital Crescent Trail.
- Transit-oriented economic development, smart growth and community revitalization inside the Beltway.

What other public investment now underway provides so many benefits for the citizens of Montgomery and Prince George's Counties?

We need the Purple Line now.

We need to recognize the stiff competition we will face from other parts of the country that are also seeking federal approval for transit projects. We can't afford to take for granted that there will be a Purple Line.

Despite the options under study in the Draft Environmental Impact Statement, the real choice that confronts us is not between rail and bus, or between an at-grade system versus an underground system. Because the competition is so stiff, our choice is between cost-effective light rail and no transit improvement at all.

STELLA B. WERNER OFFICE BUILDING • 100 MARYLAND AVENUE, 6TH FLOOR, ROCKVILLE, MARYLAND 20850
240/777-7811 OR 240/777-7900, TTY 240/777-7914, FAX 240/777-7989
WWW.MONTGOMERYCOUNTYMD.GOV/COUNCIL

We must unify – Montgomery and Prince George's Counties, our congressional delegation, our state senators and state delegates, County Executives and County Councils. We must speak with a single voice and make it clear that we want the Purple Line.

Because if we don't, we will end up with nothing at all.

And what would that mean? With no transit improvement, travel times between Silver Spring and Bethesda will increase from the current 20 minutes to 35 minutes by 2030. Between Bethesda and College Park, from the current 49 minutes to 81 minutes. Traffic congestion, air pollution and greenhouse gas emissions will all get worse. However, medium investment light rail will make travel times considerably better in 2030 than they are today. From Silver Spring to Bethesda, only 9 minutes. From Bethesda to College Park, only 34 minutes. With concomitant improvements in energy use and greenhouse gas reduction.

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Even as we respond to these important, but relatively narrow, issues, we must keep the big picture in mind. We cannot allow valid concerns over details that can be relatively easily addressed to convey a message that we don't actually support the vision that the Purple Line represents: a vision of improved mobility; a cleaner environment; invigorated, walkable communities; and a beautiful, safe hiker-biker trail. We must not permit a cacophony of disparate voices to suggest that our region doesn't really know what it wants.

We may not have unanimity of opinion. In public policy, unanimity is very rare. But I believe there is a clear, strong and growing consensus in Montgomery County behind light rail on the Master Plan alignment. Based upon the input I have received throughout my years in community activism and elected office, I believe that my constituents overwhelmingly want the Purple Line. They want it to be light rail because they perceive that as a higher-quality commuting experience than bus transit.

With a new President taking office in January, Barack Obama, committed to federal investments in infrastructure to stimulate our lagging economy, 2009 will be an extraordinarily opportune time to ask for what we want. And the stronger consensus we have around our preferred option, the better our chances of winning federal funds.

If we ask for what we don't want, we might get it! And if we aren't clear about what we are asking for, we might get nothing at all.

- RECORD #1198 DETAIL

First Name :	Council Member Eric
Last Name :	Olson
Business Name :	Prince George's County
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	Hello. I'm County Councilman Eric Olson, E-R-I-C O-L-S-O-N. I will actually be giving my formal testimony at the College Park hearing but I do want to come out here and thank you for having the New Carrollton hearing. I think it's very important that you hear from the residents on this end of the Purple Line. As you can see there are a lot of people here, there's a lot of support and I hope that you will listen to them and listen to any concerns and that we're working with the community as this project moves forward. I do think the project should move forward. It's a very important one. But I will be giving my formal testimony at the College Park hearing. But thank you for being here.

- RECORD #497 DETAIL

First Name :	Council Member Eric
Last Name :	Olson
Business Name :	Prince George's County Council
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	
Attachments :	Purple Line Testimony - Nov 2008.olson.pdf (16 kb)

Eric Olson
Prince George's County Council Member
Purple Line Testimony
November 19, 2008

Good evening. My name is Eric Olson, and I represent District 3 on the Prince George's County Council. The proposed Purple Line would run through the Third District from New Carrollton, through the Riverdale area and College Park. I am grateful for the work that has been done thus far, and I appreciate you holding two hearings in Prince George's County, in New Carrollton and now tonight in College Park. I look forward to continuing to work with the Maryland Transit Administration on this much-needed project to make it a reality sooner rather than later.

First, I want to emphasize that this project should be a light rail transit system, not a bus system. Light rail has proven to be a solid, long-term investment. It is more predictable, more efficient, and gains more ridership. Cities and suburbs across the nation from Denver to Dallas, Houston to Minneapolis, Salt Lake City to San Diego and Portland, have invested in light rail in recent years and have found that ridership has flocked to ride these light rail systems far outpacing their projections. Light rail trains accommodate more ridership than buses, and can easily add more light rail cars as ridership grows. The Washington region, which is expected to grow by 1.6 million people over the next 25 years, needs a high quality light rail system that is designed for the future.

The Purple Line is needed now to take cars off the road, to protect our environment, combat climate change, and to help spur economic revitalization in our core commercial areas and employment centers of our established communities in Prince George's and Montgomery Counties. In Prince George's alone, the Purple Line would connect the University of Maryland with its 50,000 daily commuters, the M Square Research Park with its thousands of jobs, some that are already here but many more jobs coming soon – including the FDA, USDA, NOAA and CASL as well as private technology jobs. In addition, the area around the New Carrollton Metro is expected to become an

employment center with many thousands more jobs, in addition to the IRS that is currently there now.

In the College Park area alone, the Purple Line is projected to take 7,000 cars off the road, and overall, it is expected to take 20,000 cars off the road. With games and special events at the University of Maryland, I believe we will see significant numbers of these campus visitors using light rail as well.

Prince George's County is home to a significant slice of the regional workforce, yet our transportation system both within the county and to the region's jobs is largely based on the road system. We need to connect transit across the suburbs in an East-West manner. We need to also make the most of our Metro system, to make it easier to connect to the spokes of the Orange Line, Green Line and both ends of the Red line.

Alignment and specifics

I want to address some of the specifics about the Purple Line's alignment and other considerations through District 3, starting at the New Carrollton Metro.

New Carrollton area: Whatever connection is made at the New Carrollton Metro station, it must be done in a way that is convenient for passengers transferring from light rail to Metro or AMTRAK. It also must be made in a way that anticipates the Purple Line's extension across the Metro and CSX tracks and makes it as easy as possible to extend the Purple Line on to destinations like FedEx Field, Capital Centre Boulevard, the Blue Line in Largo, the Community College and points beyond. The Prince George's County Council has taken a position supporting such a longer-term vision for the Purple Line.

Hansen Oaks/Ardwick Ardmore/West Lanham Hills: My understanding is that Purple Line planners are looking more favorably at Ellin Road rather than Harkins Road as the approach to the New Carrollton station. In either alignment, but particularly Ellin Road, I want to emphasize the need to work closely with the residential communities of West

Lanham Hills, Hansen Oaks and Ardwick-Ardmore to ensure that there are no adverse impacts and that these neighborhoods are involved in the decisions as the Purple Line travels adjacent to them. I am confident that we can all work together to ensure that there is no reduction in the quality of life in these neighborhoods with the arrival of the Purple Line.

Proposed Stop at Annapolis Road and Veterans Parkway: This is a good location for a Purple Line stop.

Glenridge: The Glenridge Park and Planning Maintenance Facility is slated as a rail yard for the Purple Line. MTA must work closely with the surrounding neighborhoods to mitigate any potential visual or noise impacts on the adjacent community. The neighborhoods that should be collaborated with should include, but are not limited to: Glenridge, Roswil HOA, Beacon Heights, Woodlawn, and West Lanham Estates. Again, my office can help to coordinate.

Proposed Stop at Riverdale Road and Veterans Parkway: With significant numbers of people living within a quarter mile of this site along Riverdale Road, this is a good site for a Purple Line stop.

Baltimore-Washington Parkway and Riverdale Road: This area of the alignment is tight, and currently, it is also a dangerous section for cars and pedestrians. Improvements for traffic flow and pedestrians are needed, and the Purple Line must be threaded through here carefully. The bridges for the B-W Parkway will likely need widening. This section must be made safe for light rail, pedestrians and cars.

Kenilworth Avenue/Riverdale Road intersection and proposed stop: This intersection is a difficult area for the Purple Line to traverse. I encourage a high investment option in order to mitigate the effect on traffic, including consideration of an aerial, grade-separated crossing. This area would also make an excellent site for a transit center and

Purple Line stop. It has a high number of pedestrians and could spur redevelopment at the Riverdale Shopping Center.

M Square Proposed Stop: With thousands of jobs coming to M Square, this must be a stop for the Purple Line.

College Park Metro Station: I commend the MTA staff for working closely with WMATA, the County's DPW&T staff, and Manekin, LLC to work through the complexities of a Purple Line alignment through this site. I believe there is consensus among these stakeholders to achieve a convenient connection between the Purple Line and the Metro station while not damaging the Transit Oriented Development slated for the area.

Paint Branch Parkway: This road is currently a speedway and with the coming of the Purple Line, investments must be made to make this a safer road, reduce speeds, and make it a safe environment for pedestrians. MTA is working with the County DPW&T to ensure that light rail can share the road with cars on this stretch of Paint Branch Parkway. We must ensure that this can be done safely – there is more work to be done to make this stretch of road as safe as possible for pedestrians, light rail, cars and trucks.

University of Maryland, East Campus: MTA has worked closely with the University and Foulger-Pratt developers to design an alignment and a light rail stop that will serve both the proposed development and the Purple Line well.

University of Maryland Campus: Campus Drive is at the heart of the University and is the alignment that would best serve students, faculty, visitors and sports fans. Investments in Campus Drive to create a safe, plaza-like Purple Line alignment that serve pedestrians well are also needed. A stop in the vicinity of the Stamp Student Union is a good location.

University of Maryland, West Campus: Another stop on the western side of campus to serve the campus growth there as well as University College would be another good location.

General Observations

Working collaboratively with the community: I encourage MTA to work closely with the community and my office through every step of the process that remains, from planning and engineering, to updates through construction, to ensure that neighborhoods are listened to. This is a project that should serve the larger community and the specific neighborhoods along its alignment.

Noise abatement: While light rail does not have the noise impacts of heavy rail like Metro, we need to work closely with neighborhoods to abate noise along turns, at the light rail yard, or anywhere along its route.

Light rail: This should be a light rail system, not Bus Rapid Transit.

Medium-High investment: For the long-term ridership benefits and the stability and efficiency of the system, we should aim for the Medium-High investment option so that it will be the most successful and lasting transit system we can hand off to our children and grandchildren.

Starting in Prince George's: Finally, I believe that we should begin this project in Prince George's County. A first phase could open between any number of locations in the County.

Thank you for the opportunity to testify and for the collaboration of the MTA team in recent years. Mr. Madden and his team have always been more than willing to meet with me and with community groups at any time. I stand ready to work with you to make this important project a reality.

- RECORD #1181 DETAIL

First Name :	Council Member Eric
Last Name :	Olson
Business Name :	Prince George's County-3rd District
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : Hello. I'm Eric Olson, member of the Prince George's County Council from the 3rd District. The first name is Eric, E- R-I-C, last name is Olson, O-L-S-O-N.

The county council strongly supports the purple line. We have on many occasions made that clear.I represent District 3 on the county council. The proposed purple line would run through the 3rd district from New Carrollton through the Riverdale area in College Park.

I'm grateful for the work that has been done by the MTA and appreciate you holding the two hearings in Prince George's County.

First I want to emphasize that this project should be a light rail transit system, not a bus system. Light rail has proven to be a solid, long term investment. It is more predictable, more efficient, and it gains more ridership.

Cities and suburbs across the nation from Denver to Dallas, Houston to Minneapolis, Salt Lake City to San Diego and Portland have invested in light rail in recent years and found that ridership has greatly exceeded their projections.

Light rail trains accommodate more ridership, they can easily add more light rail cars as ridership grows. Our metropolitan region is expected to grow by 1.6 million people over the next 25 years and we need a high quality light rail system designed for the future.

I'm not going to get into all the benefits, I think you know a lot of those things about taking cars off the road, protecting our environment and the jobs that are here at our employment centers, M2, University of Maryland and New Carrollton that are here and are expected to come, thousands and thousands of jobs that people will need to get to.

Connecting the spokes of the metro system are very important. I want to address a few alignments in specifics in District 3 starting with New Carrollton Metro and working my way west.

In the New Carrollton area, whatever connection is made at the New Carrollton Metro station, it must be done in a way that's convenient for passengers transferring from light rail to metro or Amtrak. It also must be made in a way that anticipates the purple line's extension across the metro and CSX tracks and makes it as easy as possible to extend the purple line onto destinations like Fedex field, Capital Center Boulevard, the blue line in Largo, community college, and points beyond.

The Prince George's County Council has taken a position supporting such a longer term vision for the purple line.

I want to mention several neighborhoods. The Hanson Oaks neighborhood, the Ardwick Armore neighborhood and West Lanham Hills neighborhood.

My understanding is that the purple line planners are looking more favorably at Ellen Road rather than Harkins Road as the approach to the New Carrollton Station.

In either alignment, but particularly Ellen Road, I want to emphasize the need to work closely with the residential communities of West Lanham Hills, Hanson Oaks and Ardwick Armore to ensure that there are no adverse impacts and that these neighborhoods are involved in the decisions as the purple line travels adjacent to them.

I am confident that we can all work together to ensure that there is no reduction in the quality of life in these neighborhoods with the arrival of the purple line.

Your proposed locations in District 3 for Metro, or for purple line stops I think are good, including the Annapolis Road/Veterans Parkway intersection.

I want to mention the Glen Ridge Park and Planning maintenance facility slated as a rail yard for the purple line, MTA needs to work closely with the surrounding neighborhoods to mitigate any potential visual or noise impacts on the adjacent community.

Those neighborhoods should include but are not limited to Glen Ridge, Roswell Homeowners Association, Beacon Heights, Woodlawn and West Lanham Estates.

The proposed stop at Riverdale Road and Veterans Parkway makes a lot of sense with thousands of people living along Riverdale Road in the area.

In the area of Riverdale Road and the BW Parkway, this area of alignment is tight and it is currently a dangerous section for cars and pedestrians. The purple line needs to go through there very carefully and this section of the area needs to be made much safer for light rail, pedestrians and cars.

Kenilworth Avenue, Riverdale Road intersection is a difficult one. We need to make sure that we're having a high investment option there including considering an aerial grade separated crossing. It's a good place also for a transit stop.

You have worked very closely at the Metro station at College Park to make that work. Paint Branch Parkway is another road that needs attention for pedestrians and cars and light rail.

East campus, you've worked very closely with the developers there. That's a good thing. I would say that Campus Drive is the heart of the University and that alignment makes sense.

I guess in closing, and I have written comments, I can see my time is closing here. I just want to emphasize working collaboratively with the community. My office continues to work closely with MTA on that.

I want to make sure that this project serves the larger community and the specific neighborhoods along this alignment, that we work on the noise abatement and that we work toward a medium high investment.

Finally I would just say that I hope that we can start this project in Prince George's County and I want to thank you for the opportunity to testify.

The collaboration of the MTA team in recent years, Mr. Madden and his team have always been more than willing to meet with me and the community groups at any time and I stand ready to work with you to make this important project a reality. Thank you very much.

Attachments : Olson_Eric.pdf (366 kb)

Eric Olson
Prince George's County Council Member
Purple Line Testimony
November 19, 2008

Good evening. My name is Eric Olson, and I represent District 3 on the Prince George's County Council. The proposed Purple Line would run through the Third District from New Carrollton, through the Riverdale area and College Park. I am grateful for the work that has been done thus far, and I appreciate you holding two hearings in Prince George's County, in New Carrollton and now tonight in College Park. I look forward to continuing to work with the Maryland Transit Administration on this much-needed project to make it a reality sooner rather than later.

First, I want to emphasize that this project should be a light rail transit system, not a bus system. Light rail has proven to be a solid, long-term investment. It is more predictable, more efficient, and gains more ridership. Cities and suburbs across the nation from Denver to Dallas, Houston to Minneapolis, Salt Lake City to San Diego and Portland, have invested in light rail in recent years and have found that ridership has flocked to ride these light rail systems far outpacing their projections. Light rail trains accommodate more ridership than buses, and can easily add more light rail cars as ridership grows. The Washington region, which is expected to grow by 1.6 million people over the next 25 years, needs a high quality light rail system that is designed for the future.

The Purple Line is needed now to take cars off the road, to protect our environment, combat climate change, and to help spur economic revitalization in our core commercial areas and employment centers of our established communities in Prince George's and Montgomery Counties. In Prince George's alone, the Purple Line would connect the University of Maryland with its 50,000 daily commuters, the M Square Research Park with its thousands of jobs, some that are already here but many more jobs coming soon – including the FDA, USDA, NOAA and CASL as well as private technology jobs. In addition, the area around the New Carrollton Metro is expected to become an

employment center with many thousands more jobs, in addition to the IRS that is currently there now.

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Prince George's County is home to a significant slice of the regional workforce, yet our transportation system both within the county and to the region's jobs is largely based on the road system. We need to connect transit across the suburbs in an East-West manner. We need to also make the most of our Metro system, to make it easier to connect to the spokes of the Orange Line, Green Line and both ends of the Red line.

Alignment and specifics

I want to address some of the specifics about the Purple Line's alignment and other considerations through District 3, starting at the New Carrollton Metro.

New Carrollton area: Whatever connection is made at the New Carrollton Metro station, it must be done in a way that is convenient for passengers transferring from light rail to Metro or AMTRAK. It also must be made in a way that anticipates the Purple Line's extension across the Metro and CSX tracks and makes it as easy as possible to extend the Purple Line on to destinations like FedEx Field, Capital Centre Boulevard, the Blue Line in Largo, the Community College and points beyond. The Prince George's County Council has taken a position supporting such a longer-term vision for the Purple Line.

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Proposed Stop at Annapolis Road and Veterans Parkway: This is a good location for a Purple Line stop.

Glenridge: The Glenridge Park and Planning Maintenance Facility is slated as a rail yard for the Purple Line. MTA must work closely with the surrounding neighborhoods to mitigate any potential visual or noise impacts on the adjacent community. The neighborhoods that should be collaborated with should include, but are not limited to: Glenridge, Roswil HOA, Beacon Heights, Woodlawn, and West Lanham Estates. Again, my office can help to coordinate.

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Baltimore-Washington Parkway and Riverdale Road: This area of the alignment is tight, and currently, it is also a dangerous section for cars and pedestrians. Improvements for traffic flow and pedestrians are needed, and the Purple Line must be threaded through here carefully. The bridges for the B-W Parkway will likely need widening. This section must be made safe for light rail, pedestrians and cars.

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Purple Line stop. It has a high number of pedestrians and could spur redevelopment at the Riverdale Shopping Center.

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General Observations

Working collaboratively with the community: I encourage MTA to work closely with the community and my office through every step of the process that remains, from planning and engineering, to updates through construction, to ensure that neighborhoods are listened to. This is a project that should serve the larger community and the specific neighborhoods along its alignment.

Noise abatement: While light rail does not have the noise impacts of heavy rail like Metro, we need to work closely with neighborhoods to abate noise along turns, at the light rail yard, or anywhere along its route.

Light rail: This should be a light rail system, not Bus Rapid Transit.

Medium-High investment: For the long-term ridership benefits and the stability and efficiency of the system, we should aim for the Medium-High investment option so that it will be the most successful and lasting transit system we can hand off to our children and grandchildren.

Starting in Prince George's: Finally, I believe that we should begin this project in Prince George's County. A first phase could open between any number of locations in the County.

Thank you for the opportunity to testify and for the collaboration of the MTA team in recent years. Mr. Madden and his team have always been more than willing to meet with me and with community groups at any time. I stand ready to work with you to make this important project a reality.

- RECORD #479 DETAIL

First Name :	Mayor Vernon S.
Last Name :	Archer
Business Name :	Town of Riverdale Park
Address :	5008 Queensbury Road
City :	Riverdale Park
State :	MD
Zip Code :	20737
Email Address :	
Submission Content/Notes :	
Attachments :	scan.riverdale park.pdf (125 kb)

Town of Riverdale Park

5008 Queensbury Road
Riverdale Park, Maryland 20737

November 17, 2008

Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratcliff:

The Town of Riverdale Park is strongly in favor of building the Purple Line, an environmentally responsible transportation mode that will improve east-west connectivity in the Washington, DC metro region. The Town supports the selection of the High Investment Light Rail Transit (LRT) alternative as the Locally Preferred alternative, with the following caveats:

- The River Road station should be moved to the intersection of River Road and Rivertech Court
- The Kenilworth Avenue/East-West Highway intersection should be bridged with an aerial structure to separate transit and vehicle traffic
- The Kenilworth Avenue/East-West Highway station plan should redesign the area to create a "superstation" transit plaza that will improve pedestrian safety and access, provide for ample bus transfers, and foster economic redevelopment

The High Investment LRT alternative best meets the purpose and needs for the project by most effectively supporting our local plans for economic development, community revitalization, and intermodal connectivity. We also believe that only the High Investment LRT will reduce transit travel times sufficiently to attract automobile trips to transit and improve traffic congestion in our region.

River Road Station

The Town supports a River Road Station located as shown in the High Investment LRT alternative (at the intersection of Rivertech Court and River Road, as close as possible to the residential neighborhood south of Rivertech Court). We have an existing pedestrian footpath that emerges from Taylor Road, skirts Gosling Pond and continues along Rivertech Court that residents could safely use to access the station. We believe the station should be designed to have entrances on both River Road and Rivertech Court.

We are concerned that the River Road Station shown in the Medium Investment LRT alternative is located east of Haig Drive, approximately ¼ of a mile from the Rivertech Court/River Road intersection. The DEIS states that ¼ mile is the approximate distance that Americans will walk to transit. The station location shown in the Medium Investment LRT alternative would put the station more than ½ mile from the edge of the

Telephone (301) 927-6381 Fax (301) 864-8090

residential neighborhood, thus discouraging use by town residents. A station located at the Rivertech Court/River Road intersection would be equally or more convenient for employees on the eastern side of the M-Square research park.

Kenilworth Avenue/East-West Highway Station

The Town supports a station located at the intersection of Kenilworth Avenue and East-West Highway, but we have concerns about the current alignments and designs shown in the DEIS. The DEIS states that even with the High Investment LRT alternative, the alignment would transition from a tunnel to a surface alignment west of the Kenilworth Avenue/East-West Highway intersection (thereby crossing the intersection at-grade). It is vital that the proposed alignment be separated from the traffic-choked Kenilworth Avenue/E-W Highway intersection. For this reason, we are supportive of an aerial structure that would begin on Kenilworth Avenue and travel over the intersection to the proposed station. We believe the topography at the intersection is favorable for such a design.

An aerial structure would likely displace some commercial businesses around the proposed station at the southeast corner of the intersection. The Town has substantial Environmental Justice populations living in the vicinity of the proposed station who are dependent on pedestrian access to these commercial businesses. While the project has the potential to positively impact these populations by increasing transit access, we also expect that any displacements of commercial businesses would be properly mitigated to protect EJ populations.

It is important that an aerial structure be designed in a context sensitive manner to minimize visual, aesthetic and community cohesion impacts to adjacent residential areas. An aerial structure and elevated station create the potential for a larger redevelopment/revitalization of the southeast corner of the intersection and along Kenilworth Avenue. Project planners should coordinate with the Kenilworth Avenue Revitalization Corridor Steering Committee among other stakeholders on design of an aerial structure.

Regardless of the alternative selected, the proposed station location will need much greater investment in pedestrian safety and streetscape redesign. The transit dependent populations living nearby will largely access the station on foot. The surrounding traffic volume and speed make the proposed location difficult and dangerous to access. Entrances need to be designed as near to the Riverdale Road/Kenilworth Avenue intersection as possible, since many pedestrians will access the station from that direction. Managing intermodal connections (car and bus), commercial uses and pedestrian access will require significant design effort and stakeholder coordination.

Thank you for your attention.

Vernon S. Archer
Mayor, Town of Riverdale Park

- RECORD #1178 DETAIL

First Name :	Mayor Vernon
Last Name :	Archer
Business Name :	Town of Riverdale Park
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : I'm here to convey the official position of the Town of Riverdale Park, not just my own personal opinions.

The Town of Riverdale Park is strongly in favor of building the purple line. We are in favor of supporting the high investment light rail transit alternative as the locally preferred alternative with the following caveats.

We believe that the River Road station should be moved to the intersection of River Road and River Tech Court. We also believe that the Kenilworth Avenue, East/West Highway intersection should be bridged with an aerial structure to separate transit and vehicular traffic.

Furthermore, the Kenilworth Avenue, East/West Highway station design should be reimagined the area to create a super station transit plaza that will improve pedestrian safety and access, provide for ample bus transfers and foster economic redevelopment.

The high investment LRT alternative best meets the purposes and needs of the project by most effectively supporting our local plans for economic development, community revitalization and intermodal connectivity.

We also believe that only the high investment LRT will reduce transit travel time significantly and thereby attract automobile trips to transit and improve traffic congestion throughout our region.

The town supports a River Road station located as shown on the high investment LRT alternative. We have an existing pedestrian footpath that emerges into that area and we believe the station should be redesigned to have entrances at both River Road and River Tech Court.

We are concerned that the River Road station shown in the medium investment LRT is located at Hague Drive and by the DEIS' own estimate, if you get beyond a quarter mile, ridership is going to drop off substantially and people aren't going to come.

Therefore, we would advocate the River Tech and River Road intersection. Regarding Kenilworth Avenue and East/West Highway station, the town supports a station located at the intersection of Kenilworth Avenue and East/West Highway, but we have concerns about the current alignment and designs shown in the DEIS.

The DEIS states that even with the high investment LRT alternative, the alignment would transition from a tunnel to a surface alignment west of Kenilworth Avenue, East/West Highway intersection.

There is too much traffic in this area already and to further, this would add to further congestion. It is vital that the proposed alignment be separated from the traffic at both Kenilworth and East/West Highway interjection.

The aerial structure would likely displace some commercial businesses around the proposed station in the southeast corner of the intersection.

The town has substantial environmental justice populations living in the vicinity of the proposed station who are dependent on pedestrian access to these commercial businesses.

While the project has the potential to positively impact these populations by increasing transit access, we also expect that any displacements of commercial businesses would be properly mitigated to protect environmental justice populations.

It is important that an aerial structure be designed in a content-sensitive manner to minimize visual, aesthetic and community cohesion impacts to adjacent residential areas.

An aerial structure and elevated station create the potential for larger redevelopment revitalization of the southeast corner of the intersection and along Kenilworth Avenue.

The project planner should coordinate with the Kenilworth Avenue Revitalization Corridor Steering Committee along with other stakeholders on design of an aerial structure.

Regardless of the alternative selected, the proposed station location will need much greater investment in pedestrian safety and street scape redesign.

The transit dependent populations living nearby will largely access the station on foot, the surrounding traffic volume and speed makes the proposed location difficult and dangerous to access.

Entrances need to be redesigned as near to the Riverdale Road/Kenilworth Avenue intersection as possible since many pedestrians will access the station
from all directions.

Managing intermodal connections (inaudible) commercial uses and pedestrian access will require significant design effort and stakeholder coordination. Thank you.

- RECORD #610 DETAIL

First Name :	Bettyjean
Last Name :	Bailey-Schmiedigen, Mayor
Business Name :	Town of Brentwood
Address :	4300 39th Place
City :	Brentwood
State :	MD
Zip Code :	20722
Email Address :	
Submission Content/Notes :	
Attachments :	Bailey-Schmiedigen 34467.pdf (104 kb)

Town of Brentwood

4300 39th Place
Brentwood, MD 20722
(301) 927-3344 or (301) 927-7395
Fax: (301) 927-0681

November 13, 2008

The Honorable Martin O'Malley
Governor
State of Maryland
100 State Circle
Annapolis, Maryland 21401-1925

Re: Town of Brentwood Support for the Purple Line

Dear Governor O'Malley:

The Mayor and Council of the Town of Brentwood strongly supports the financing and building of the Purple Line, which, when completed, will provide multiple light rail stops between Prince Georges and Montgomery Counties.

In addition to relieving automobile-related pressure on the Capital Beltway, the Purple Line will allow transit-oriented commercial and residential development that will assist in transforming a number of Maryland communities. The Purple Line is expected to increase foot traffic and positively affect businesses in Bethesda and New Carrollton, as well as the areas surrounding Silver Spring, Langley Park and College Park.

The Purple Line is supported by legislators from Prince Georges and Montgomery Counties. Recently, Maryland Transportation Secretary John Pocari announced the establishment of a state legislative caucus that will advocate for the funding of the project to the federal government, which the Mayor and Council strongly support. We are also pleased that the State has committed to funding the project's planning and design phases.

In a recent *Prince George's Sentinel* article (dated October 30, 2008), in addition to commuters, the Purple Line is expected to particularly benefit "small businesses, their employees and all other low-to-moderate income residents of Prince George's and Montgomery" Counties, as well as University of Maryland students. We believe serving these and all groups will provide a convenient and environmentally-friendlier alternative to the estimated "85,000 car travelers and 61 buses *per hour*" [*italics* added] that transport bi-county commuters daily.

Even though public funding has become more restricted at both the state and federal levels, we believe the Purple Line is a worthy public investment.

- RECORD #1174 DETAIL

First Name :	Mayor Steve
Last Name :	Brayman
Business Name :	City College Park
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : I'm the Mayor of College Park and I welcome you to College Park. Thank you very much for having this hearing. Thank you very much for being a part of the process.

All I can say, well, I'm going to say a few more things than this. The City of College Park fully endorses the purple line. In fact, we just wish that this was the grand opening, not just a hearing.

I am proud to say that on several occasions we have been able to reach a consensus with campus, first on an inner line alignment and additionally in later years on not only the inner alignment but also a high quality transit corridor and for it to connect with College Park.

So I'm very happy that tonight we do have that plan before us and we are connecting it with the proposed East campus, we are connecting it with our existing Metro station and connecting it with campus.

Campus generates a lot of traffic here and we believe that we can take a lot of cars off the street and service a lot of people here in College Park and outside College Park that come to College Park in both counties that are involved.

I'd like to add something, and that is an official city position, as to some personal notes. We'd like to call on that this should be light rail. Light rail is the only way that we will realize a high quality corridor transit system, and on top of that light rail is of the quality that will bring additional quality in and around the area attracted to this.

We'd also like to point out that in Prince George's County, while there are still some decisions to be made, we seem to really have less controversy. So I would like to call upon Montgomery County and the state and for whatever Prince George's County can do to solve the issues and the barriers that are facing the alignment in Montgomery County.

Quite frankly, this has so much social good, a golf course should not stand in the way.

As to the campus alignment here in College Park, let me just say that I've been a proponent of examining the various alternatives and finding out what works best.

While I have seen that there are some comparisons between the Prinkert and Campus Drive alignments, let me just say personally I have not seen where the inherent value of the campus drive alignment and its central location, its existing corridor, or transit corridor, and probably most importantly all the foot traffic that is currently centered in that area that this transit system would be able to capture immediately where it already exists.

That inherent value is not outweighed by in my opinion the Prinkert Drive option. So I do endorse the Campus Drive option. I do wait to hear more. I believe campus will have some additional information on that.

Let me just say that since we in Prince George's County seem to have our act together more on the purple line, I would also endorse the state to put forward starting construction in New Carrollton and working west rather than the opposite.

I believe that will allow for any resolve or problems that need to be resolved in Montgomery County be resolved by the time we get there. But again, we are looking forward to the purple line. We just wish it was

opening yesterday. Thank you very much.

- RECORD #1220 DETAIL

First Name :	Mayor Stephen
Last Name :	Brayman
Business Name :	City of College Park
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	Stephen Brayman, S-T-E-P-H-E-N, Brayman, B-R-A-Y-M-A-N. I'm the Mayor of the City of College Park and it's great to hear all these comments about Montgomery County officials wanting themselves and the residents to come to the campus via the purple line. My only wish would be that I wish I could have ridden it here today. I want to reiterate the City of College Park's strong support for the purple line. I believe the only attractive option that will get all kinds of people out of their cars would be a light rail option. I also expect that the city will be sending in within the comment period more detailed comments on exactly which options we prefer. But I'm also mainly here today to call on Montgomery County and the state to resolve the controversies here in Montgomery County. While in Prince Georges County we still have some decisions to be made with respect to the alignment, I'm not aware of anyone or any group of people opposing the purple line in Prince Georges County. This project has way too much social and environmental good for a golf course to get in the way. If it can't be resolved, let me just suggest, or even if it can be resolved, we are fine with having the construction start in New Carrollton. By the time we get to the Montgomery County line, hopefully all the controversies will be solved. Lastly, let me thank the Governor and the Secretary and the MTA for all the great work. But in particular, Mr. Madden and his team. I thought it was a sports game, but Madden's team has done great work and I expect that it will continue. So Mr. Madden, thank you very much. I appreciate the opportunity to comment.

- RECORD #2205 DETAIL

First Name :	Mayor Stephen
Last Name :	Brayman
Business Name :	City of College Park
Address :	4500 Knox Road
City :	College Park
State :	MD
Zip Code :	20740
Email Address :	
Submission Content/Notes :	
Attachments :	City of College Park.pdf (252 kb)

City of College Park
Office of the Mayor and City Council

4500 Knox Road
College Park, MD 20740
301-864-8666
Facsimile: 301-699-8029

Mayor

Stephen A. Brayman
7604 Sweetbriar Drive
301-345-2547

Council Members

District 1

Jonathan R. Molinatto
5210 Huron Street
410-674-7253

Patrick L. Wojahn
5015 Lackawanna Street
240-988-7763

District 2

Robert T. Catlin
8604 49th Avenue
301-345-0742

John E. Perry
4809 Osage Street
301-345-7526

District 3

Mark Cook
4423 Lehigh Road, #360
240-554-2231

Stephanie Stullich
7400 Dartmouth Avenue
301-864-6709

District 4

Mary C. Cook
9806 47th Avenue
301-345-2375

Karen E. Hampton
9222 St. Andrews Place
301-935-5810

January 13, 2009

Diane Ratcliff
Director of Planning
Maryland Transit Administration
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratcliff:

The City of College Park strongly supports construction of the Medium Investment Light Rail Transit (LRT) alternative of the Purple Line with added features, including the aerial crossing of the Kenilworth Avenue/East-West Highway intersection. The LRT alternative is an investment in livable communities that will relieve traffic congestion and reduce carbon emissions. Our roads have become increasingly congested, and frustration with traffic is one of the most common complaints of the citizens of our community; the Purple Line is projected to eliminate 7,092 vehicle trips in College Park each day. Selection of the Medium Investment LRT alternative will provide shorter travel times, generating benefits for users in terms of time savings, and result in a high number of riders using the system.

The City recognizes the community and economic development benefits associated with the development of the Purple Line, and believes the Purple Line will encourage smart, transit-oriented growth that will bring new life to the Route 1 corridor. The City supports the location of a station at the Route 1 and Rossborough Drive intersection, as part of the East Campus development, and at the College Park Metro, as part of a mixed-use joint development project. The City encourages the Maryland Transit Administration (MTA) to site the station at the College Park Metro as close as possible to the station entrance and platform to facilitate connections between the two modes of transit. Furthermore, the City supports the relocation of the River Road station near the intersection of River Road and Rivertech Court, as well as the redesign of the Kenilworth Avenue/East-West Highway station to create a bridged or aerial structure with a "superstation" transit plaza, if preferred by the Riverdale community.

The City has listened carefully to the local debate over the question of the preferred alternative through the University of Maryland-College Park campus, and we prefer the Campus Drive alignment to the Preinkert Drive alignment for several reasons.

We believe that locating this new transit route along the most heavily travelled route through campus is a sensible approach to maximizing ridership, and we note that three major student stakeholder groups – the Student Government Association, Residence Hall Association, and Graduate Student Government – have expressed support for the Campus Drive alignment as the alignment that would be most beneficial for students. We believe that using an existing roadway is a more environmentally sensitive approach than cutting a new transitway through existing green space on campus. We also note that the Preinkert Drive alignment would have an adverse impact on historic views of Morrill Hall, Washington Quad, and Memorial Chapel, one of the most iconic historic images of the University of Maryland campus.

We understand that the University of Maryland has concerns about the impact electromagnetic interference and vibrations from transit vehicles may have on sensitive scientific instruments being used to conduct important research at the University. We also recognize that MTA is in the process of reviewing the studies conducted by the University concerning this issue and is also conducting its own analyses of potential impacts and possible mitigation measures. Because we do not have all of the facts needed to make the most informed recommendation about the preferred campus alignment, we understand that the MTA will accept additional comment from the City after we have had the opportunity to review the MTA's final evaluation of this issue.

Thank you for the opportunity to provide our comments on the Purple Line. The City looks forward to hearing the results of the additional analyses regarding electromagnetic interference and vibrations.

Sincerely,

Stephen A. Brayman
Mayor

CC: Thomas E. Dernoga, Prince George's County Council, District 1
Eric C. Olson, Prince George's County Council, District 3
Ann Wylie, Interim Vice President, Division of Administration Affairs, UMD
Town of Riverdale Park
21st District Delegation

- RECORD #1177 DETAIL

First Name :	Mayor Judith F.
Last Name :	Davis
Business Name :	City of Greenbelt
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	I'm the Mayor from the City of Greenbelt. I'm here tonight to firmly state that the City of Greenbelt right from the very beginning has always supported the purple line. Especially now in its present configuration. Basically it makes logical sense. It should have been built long ago as an east/west connection that eliminates going all the way into DC and then all the way back out again to get to some of the areas in Montgomery County. So for environmental reasons, economic reasons, it should have been built. Especially for those folks who cannot afford a car and need mass transit. I can't imagine how long they sit on a bus now or the long trip down through the Metro trying to get to their jobs. It also is an excellent avenue for our disabled and for anyone who chooses to decrease our carbon footprint by using mass transit. Now, I know that one of the things that we have discussed as a city council and it has already been said now three times, so let me make it four times. Start from New Carrollton. I know that the area around here, the four cities and so on, we don't have the millions and millions of dollars that obviously one city or one area can do to fight this. So while they spend all that money and raise the economy over there, we'll simply say save money, start from New Carrollton and we'll certainly use it while they're still fighting over it. Also the City of Greenbelt would support whatever College Park feels is a correct alignmen through the campus of University of Maryland. On a personal note, I myself would prefer light rail. I have been on may city's light rail systems and they are just absolutely tremendous and certainly quicker, cleaner and faster than perhaps just even the bus rapid transit. So what I finally would like to say is accelerate the process. We unfortunately put a lot of money and a lot of time into another major road project that probably will not do as much as the purple line will do. We now need to make sure that the purple line has the funds and the planning and the construction. Do it now, please. We have waited long enough. Thank you.

- RECORD #2334 DETAIL

First Name :	Council Member Patricia D.
Last Name :	Dennison
Business Name :	Town of Berwyn Heights
Address :	5603 Seminole Street
City :	Berwyn Heights
State :	MD
Zip Code :	20740
Email Address :	
Submission Content/Notes :	
Attachments :	Dennison_Patricia.pdf (132 kb)

Purple Line

MTA Maryland

12/13/08

Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Patricia D. Dennison Organization: Berwyn Heights Town Council / Resident, Berwyn Heights

Address: 5603 Seminole St.

City: Berwyn Heights State: MD Zip Code: 20740

I/We wish to submit the following comments on this project: The town of Berwyn Heights strongly supports the construction of the Purple Line. Support is given to Alternative 8, the High Investment LRT to provide a high quality, faster and dependable east-west transit link that does not exist today. The Purple Line would support economic development and strengthen and revitalize communities in the east-west corridor, improve access to MARC, AMTRAK and bus services. The Purpline Line would give residents of Maryland access to commercial, office and residential development to Bethesda, Silver Spring, Takoma Park, Langley Park, The University of Maryland/College Park and the City of New Carrollton. We also support a hiker-biker trail as part of the function of the Purple Line

- RECORD #1180 DETAIL

First Name :	Council Member Katrina
Last Name :	Dodro
Business Name :	City of New Carrollton
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	I'm on the city council from New Carrollton. I am here to give my full support for this project, particularly for the light rail transit option, the high end option for this project to continue. I did speak yesterday in Chevy Chase, but today I'm just going to address a little bit more about the aspects of it that are important to Prince George's County residents in particular. Although we do see that there are other projects going on that will connect the east and west, particularly the ICC, that will not meet the needs of a majority of people who still will need to be transported back and forth between this area and the Bethesda area. There are many people for many different reasons who still need public transportation who do not drive cars. That can be anything from someone who is disabled, someone who has a medical condition, to people who simply cannot afford to own a car. Therefore, this is necessary for these residents to be able to go back and forth, particularly since the medical center is being transferred to Bethesda Naval Medical Center, away from Walter Reed, and there are a lot of veterans who live in Prince George's County who will need to take advantage of that situation. I also want to make sure that we do not forget about our students at the University of Maryland. As we all know, there is problems with housing and there are many students who are commuting. This will allow students and faculty who are commuting to be able to reach the University of Maryland in a timely manner in a less stressful manner, and will also help to improve quality of life issues for them. But we do want to make sure that all of the residents of Prince George's County have access to all of the opportunities that are available on the western end as well, including the technology corridor that is connected in Montgomery County. Particularly of interest to myself as well is making sure that students who might be interested in internships or entry level people who might be interested in working in that area who might not have funds, as I said before, for cars, will have access to be able to travel back and forth. This is a quality of life issue, and the purple line would make the quality of life a much stronger and for people who are residents of gorgeous Prince George's County, we need to make sure that they have access to all of the same things that are available to people who are in Montgomery County to be able to work and if they want to, to play there as well. Thank you.

- RECORD #1318 DETAIL

First Name :	Council Member Katrina
Last Name :	Dodro
Business Name :	New Carrollton
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : Katrina Dodro, K-A-T-R-I-N-A, D-O-D-R-O. And I am on the city council in the city of New Carrollton. I am strongly in favor of option 8 of the Purple Line or the high-investment light rail version of this project. Boy, it's really hard to be the first one to go.

This project would allow for a great deal of positive impacts on the citizens, I believe, of New Carrollton, of Prince George's County, and of Montgomery County. There are numerous advantages for the vast majority of the public. I know that, obviously, not everyone is going to agree but I think that it will also dramatically assist improving the quality of the life and quality of life issues for people of lower to middle incomes, class incomes.

It would provide access to the technology corridor for numerous people who might not have the transportation ability without public transportation to work or to do internships or to even look into the options of working for the higher-end companies and technology companies which are available in Bethesda and in the Montgomery County side.

It will also allow students and entry level professionals who might work in this area but can't afford the cost of living in this part of the area to be able to live in other areas and still be able to afford transportation. I think that that is a strong issue that absolutely has to be addressed by this is that it will allow access for all kinds of people of all kinds of economic backgrounds to at least start to look for, for jobs and careers in other areas than where they live.

Also, looking at retirees from the military. My parents are retired and are retired from Andrews Air Force Base. And when I talked to them about the Purple Line, they were very concerned about it and very much wanting to see this line come in, due to the fact that all of the medical services that they were getting at Walter Reed are now being moved to the Bethesda Medical Center.

And my mother, in particular, was complaining about how difficult it is to get to the Bethesda Medical Center, and even once you get parking how far away that is from the center and the facilities that are needed, which she said that doesn't make sense. Here, these people are 50, 60, 70 and 80 years old, need to get in here and it's made difficult.

So from that aspect, she went and started telling her friends about it and they all started sending me e-mails saying that they wanted me to, to say on behalf of them that they were doing this. I asked them to turn in those comments and e-mails and letters to you so that you would have those, but there's a great deal of them who are stationed from Andrews Air Force Base and who still live in that immediate area who are looking for an alternative way to be able to get there, to the Bethesda Medical Center. So, that is another concern that did not originally register with me until I spoke with my, my family about this.

Environmentally, the line would drastically reduce the number of people who are on the beltway who are commuting from College Park and University Park and Hyattsville and New Carrollton that are commuting into this area where we are today. And I would like to have the ability for people to do that. We want to lower our carbon footprint that we're leaving behind here and we also want to be able to make it economically viable by reducing gas and also reducing omissions.

Finally, I urge the Department of Transportation to start this project in Prince George's County where there is a huge amount of support for this project. Perhaps some other issues could be worked out in the

meantime. I, as I said, favor the high-investment option number 8 for this project. The Purple Line really represents a higher quality of life. And it represents opportunities for other people. And so I urge that we continue to think of this. Thank you.

- RECORD #3246 DETAIL

First Name :	Katrina
Last Name :	Dodro
Business Name :	Council member City of New Carrollton
Address :	7316 Gavin St
City :	New Carrollton
State :	MD
Zip Code :	20784
Email Address :	kdodro@new-carrollton.md.us
Submission Content/Notes :	My name is Katrina Dodro, and I am on the city council in New Carrollton. We are having an Earth Day festival on April 18, 2009 from noon-5pm. I would like to request that staff from MTA come and set up a viewing of the purple line plans at our event. Please have someone call me at your earliest convenience, and I will give more specific details. My phone number is 301-513-9239. Thank you very much.

- RECORD #1324 DETAIL

First Name :	Mayor Peter
Last Name :	Fosselman
Business Name :	Town of Kensington
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes :

Good evening. For the record, my name is Peter Fosselman. That's P as in Paul, E-T-E-R, Fosselman, F as in Frank, O-S- S as in Sam, E-L-M-A-N. You're welcome. And for the record, I'm the mayor of the town of Kensington and I'm here on behalf of our town council. Thank you for the opportunity this evening and I appreciate the hearing.

On November 10th of this year, our town council did vote to support the construction of a Purple Line route. However, the council also unanimously agreed to the alternative routes. Think they should be studied before any final decisions are made.

The town is a tree city, U.S.A., and would like to see the least invasive construction used, leaving as little negative impact as possible on the existing environment. They are also concerned aboutthe original alignment studied, which was done before decisions on the Base Realignment Act were determined. I feel a route closer to the existing NIH metro as well as the Naval Medical Facility would be more logical.

The last concern would be that the potential traffic issues created by the Purple Line with a direct at-grade crossing along Connecticut Avenue, which I assume would be the same for any of the potential tracks. This would cause even more traffic that would affect the towns that are north of this line, including Kensington. Kensington has the highest number of traffic flowing through Connecticut Avenue within our borders, greater than Chevy Chase, because at Jones Bridge Road and East-West Highways is when you begin the east-west connection before one enters into Chevy Chase. Thus, the backups would be created as a result of the regular Purple Line crossings and would surely make the horrendous traffic jams we already have even worse.

I thank you again for the time from the state and I appreciate your concerns.

- RECORD #1983 DETAIL

First Name :	Mayor William F.
Last Name :	Gardiner
Business Name :	City of Hyattsville
Address :	4310 Gallatin Street
City :	Hyattsville
State :	MD
Zip Code :	20781
Email Address :	
Submission Content/Notes :	
Attachments :	Gardiner_William.pdf (62 kb)

William F. Gardiner
Mayor

Elaine Murphy
City Administrator

January 6, 2009

Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratcliff:

RE: AA/DEIS – MTA Purple Line Project

I am writing to convey the City of Hyattsville's comments on the Maryland Transportation Administration (MTA) proposed Purple Line.

The City Council has reviewed the Alternatives Analysis and Draft Environmental Impact Statement (AA/DEIS) of the proposed 16-mile transportation enhancement and is supportive of Light Rail Transit, as we believe this option would provide the highest ridership, shortest transit times and offer the best opportunity for investment in transit-oriented development in the region.

The implementation of the Purple Line will provide a necessary East-West transportation alternative, thereby improving transit connectivity to and from the City of Hyattsville as well as areas in northern Prince George's County and Montgomery County.

Thank you for the opportunity to comment on the proposed alternatives for the Purple Line, and we look forward to continued progress for this project.

Sincerely,

William F Gardiner

William F. Gardiner
Mayor

c: City Council
Elaine Murphy, City Administrator

G:\CITYCLRK\09\Letters\Purple Line - City Comments - 1 6 09.doc

RECEIVED
JAN 8 2009
DIRECTOR'S OFFICE
OFFICE OF PLANNING

- RECORD #845 DETAIL

First Name :	Mayor Andrew
Last Name :	Hanko
Business Name :	City of New Carrollton
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	I don't see Delegate Ivy, but I am Andrew Hanko, H-A-N-K-O, the Mayor of the City of New Carrollton. I would like to at this time, tell you how happy we are that we are able to host this very important hearing. And as the Mayor of New Carrollton I support the concept of the Purple Line, although, there are a number of concerns and issues still to be addressed and decided. I support the goal of the Purple Line which is to provide a faster, more reliable Transit Service which will provide better connections along a 16-mile line to the New Carrollton Metro Station Transportation Hub and make it easier for riders to get jobs, shopping, schools, entertainment, and other services. The icing on the cake, so to speak, will be any reduction of the traffic on the Beltway, which we all know is horrendous between New Carrollton and Bethesda. From my perspective as Mayor, the Purple Line begins in New Carrollton and ends in Bethesda. One of my concerns, as I mentioned at the beginning, that the Mayor and the Council have and that is we hope that they will use Veterans Parkway from Metro Station, down the tracks up Veterans Parkway and that is the major concern that the Mayor and the Council have at this time. We will be in touch with you and we will keep all of our options open, but at this time we do support, enthusiastically, the Purple Line. Thank you very much.

- RECORD #2204 DETAIL

First Name :	Mayor Andrew C.
Last Name :	Hanko
Business Name :	City of New Carrollton
Address :	6016 Princess Garden Parkway
City :	New Carrollton
State :	MD
Zip Code :	20784
Email Address :	
Submission Content/Notes :	January 12, 2009

Diane Ratcliff, Director
Office of Planning
Maryland Transit Administration
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

The Mayor and Council of the City of New Carrollton unreservedly support the concept of the Purple Line and endorse the Light Rail Transit (LRT) Build Alternative. Although there are a number of concerns and important issues still to be addressed and decided attendant with any of the Build Alternatives; nevertheless we agree that, as stated in the Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS), “improvements to the transportation system in the corridor need to address the transportation challenges of traffic congestion, slow transit travel time, limited mode options, and degraded mobility and accessibility, and poor transit system connectivity.

We support the goal of the Purple Line which is to provide a faster, more reliable transit service which will provide better connections to the New Carrollton Metro Station Transportation Hub for a number of population centers and make it easier for riders to get to jobs, shopping, schools, entertainment and other services, while reducing Beltway traffic between New Carrollton and Bethesda, thus also reducing automobile emissions.

Due to the uncertainty associated with the availability of federal, state and local capital funds, possibly limiting the scope of the Purple Line project, and the possibility of having to accomplish the project in phases, we consider that it would make sense to begin construction of the project in New Carrollton, the Purple Line terminus. Population centers could be added, proceeding toward Bethesda, as funding is available.

Sincerely,

Andrew C. Hanko
Mayor
City of New Carrollton

Attachments : City of New Carrollton.pdf (121 kb)

CITY of NEW CARROLLTON
6016 PRINCESS GARDEN PARKWAY · NEW CARROLLTON MARYLAND 20784-2898
(301) 459-6100 FAX (301)459-8172

January 12, 2009

Diane Ratcliff, Director
Office of Planning
Maryland Transit Administration
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

The Mayor and Council of the City of New Carrollton unreservedly support the concept of the Purple Line and endorse the Light Rail Transit (LRT) Build Alternative. Although there are a number of concerns and important issues still to be addressed and decided attendant with any of the Build Alternatives; nevertheless we agree that, as stated in the Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS), "improvements to the transportation system in the corridor need to address the transportation challenges of traffic congestion, slow transit travel time, limited mode options, and degraded mobility and accessibility, and poor transit system connectivity."

We support the goal of the Purple Line which is to provide a faster, more reliable transit service which will provide better connections to the New Carrollton Metro Station Transportation Hub for a number of population centers and make it easier for riders to get to jobs, shopping, schools, entertainment and other services, while reducing Beltway traffic between New Carrollton and Bethesda, thus also reducing automobile emissions.

Due to the uncertainty associated with the availability of federal, state and local capital funds, possibly limiting the scope of the Purple Line project, and the possibility of having to accomplish the project in phases, we consider that it would make sense to begin construction of the project in New Carrollton, the Purple Line terminus. Population centers could be added, proceeding toward Bethesda, as funding is available.

Sincerely,

Andrew C. Hanko
Mayor
City of New Carrollton

- RECORD #1189 DETAIL

First Name :	Council Member Konrad
Last Name :	Herling
Business Name :	City of Greenbelt
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	My name is Konrad Herling. Konrad is spelled with a K. Herling is spelled H-E-R-L-I-N-G. I'm a member of the Greenbelt City Council. Two decades ago, Maryland led the country on an alternative course to the status quo by committing itself to a policy of smart growth to wean our citizens, businesses and labor away from the fossil fuels earlier than other stats in our country. We were ahead of the curve. Other states such as Tennessee, looked to our example. We would preserve and enhance the quality of our Chesapeake Bay, reduce pollutants, and move away from the policy of sprawl towards a more intelligent use of our land while our population would continue to grow, to grow in transit oriented areas rather than in rural farm areas. While moving ahead with the ICC is more than bad enough, we should not exacerbate this by failing to move ahead with the purple line. Our state should be a model of how to responsibly and intelligently deal with growth. Even more important with a projected population growth which will occur due to the impact from the BRAC realignment. Further, we have a moral obligation to implement policies which will reduce our dependence on fossil fuels, not increase them. While we are focused for the immediate future on a purple line which connects Montgomery and Prince George's Counties, it should be a line which connects around the entire Washington region if we are to truly be proactive in addressing the needs for an environmentally sound and energy efficient transportation. Thank you.

- RECORD #1320 DETAIL

First Name :	David
Last Name :	Lublin
Business Name :	Town of Chevy Chase
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : And my name is David Lublin, it's spelled D-A-V-I-D, Lublin is spelled L-U,B as in boy, L-I, N as in name. And I'm a member of the Town Council of the Town of Chevy Chase. Thank you for the opportunity to speak with you about this important issue today. Many others will speak about the need to protect the trail, vital green space in a rapidly growing area and the need for public transit. However, I plan to focus on serious concerns that the town of Chevy Chase has regarding the ridership and cost estimates and the DEIS.

As will be outlined in the town's written submission, these estimates seriously underestimate cost and overestimate ridership for the five options on the trail. At the same time, MTA has failed to optimize the Jones Bridge Road Bus Rapid Transit Alignment despite repeated requests from the town. Clearly, changes need to be made if the ENVIRONMENTAL IMPACT STATEMENT is to fulfill the legal requirement to optimize all options and estimate cost and ridership accurately.

First, we remain concerned that the ridership estimates for the five options on the trail continue to include riders from beyond the half-mile limit in violation of accepted transportation planning standards, despite repeated efforts by the town to point out this error. In response to inquiries, MTA replied that it had adhered to "the model" but this vague answer suggests that it continues to include riders from outside the appropriate catch-man(?) area.

Second, the ridership estimates continue to assume a free transfer to Metro and fail to reflect that the cost of the transfer must be borne by either passengers, thus reducing ridership, or by the state, thus increasing operating costs.

Although the town has repeatedly pointed out this problem, MTA continues to assume a free transfer, even though WMATA's current practice is to charge for intermodal transfers and FTA requires the analysis to reflect the current practice.

In addition, the model fails to follow the standard industry practice of including time penalties for transfers, such penalties account for the time it takes to complete a transfer, including wait time plus the added inconvenience and anxiety associated with transferring.

Third, there are two significant cost to be borne by the county which appear to be outside the Purple Line cost estimates, raising questions as to the true cost of the Purple Line. One is the 60 million dollar southern elevator connection in Bethesda Metro.

MTA fails to include cost for the elevator in its budget for the Master Plan light rail options and it is unclear what credit the county will get for providing this needed amenity. Yet the cost to put in a new Metro connection at National Naval Medical Center are included in that alignment's budget, pushing the cost of the Jones Bridge Road option up.

The other is the cost for building the trail. We've heard estimates between 12 and 14 million dollars, conservatively, which the DEIS states will be borne by the county. These costs are not easily isolated in the Purple Line budget and it is unclear if the estimated costs include the many long ramps, grading, retaining walls, and landscaping in their analysis. The ENVIRONMENTAL IMPACT STATEMENT should contain an accurate and total estimate of cost and benefits and the county should know exactly to what it is committing.

Despite MTA's best efforts to produce favorable numbers for the light rail options on the trail, these options remain like horses which barely qualify for a race and have little chance of finishing in the money or getting federal funding. If we really want to move the Purple Line forward, MTA and the ENVIRONMENTAL IMPACT STATEMENT need to take a more serious look at the Jones Bridge Road option and to optimize it correctly. The projected growth of the Woodmont Triangle, the back process, and the enormous growth of National Naval Medical make this imperative.

MTA has repeatedly emphasized that it relied in the accepted council government's model. However, MTA has amazingly relied on a pre-BRAC version of this model. If the changes caused by BRAC were minor, this wouldn't matter much. However, BRAC is going to result in an enormous increase in traffic. The Purple Line is an ideal opportunity to address this problem by providing a one-seat ride to medical center in Bethesda, yet MTA has not optimized this option.

Unbelievably, MTA's estimates has the supposedly optimized version on Jones Bridge Road running at a slower speed than the slowest local bus on the same road today. MTA has also not done a reasonable study of traffic signal, priority for this alternative, a key feature of it.

Finally, the DEIS repeatedly states that the trail was purchased as a, quote, transitway and in the Master Plan, reality is far cloudier, the formally little used train right-of-way was purchased as part of the Rails to Trails program, the Montgomery County Master Plan calls for a one lane trolley, not the two lane light rail proposed by the Purple Line.

And the 10 million dollars used to purchase the trail includes segments now part of the Capitol Crescent Trail between Bethesda and D.C. Does MTA claim that this portion of the trail is also reserved for a future light rail network?

Thanks for providing myself and the town the opportunity to participate in this process. Instead of promoting an option which wrecks two parks, the Capitol Crescent Trail and Woodmont Plaza for the price of one light rail, the ENVIRONMENTAL IMPACT STATEMENT needs to reexamine the Jones Bridge Road Bus Rapid Transit option so that we can get two transit options, two transit lines, the Purple Line and the Corridor Cities Transitway for the price of one. Thank you.

Attachments : Wrrtn Tstmny.CCCnclmmber D. Lublin.pdf (2 mb)

Testimony of Town of Chevy Chase Councilmember David Lublin

Thank you for the opportunity to speak with you about this important issue today. Many others will speak about the need to protect the Trail—vital green space in a rapidly growing area—and the need for public transit. However, I plan to focus on serious concerns that the Town of Chevy Chase has regarding the ridership and cost estimates in the DEIS. As will be outlined in the Town's written submission, these estimates seriously underestimate costs and overestimate ridership for the five options on the Trail. At the same time, MTA has failed to optimize the Jones Bridge Road Bus Rapid Transit alignment despite repeated requests from the Town. Changes clearly need to be made if the EIS is to fulfill the legal requirement to optimize all options and estimate costs and ridership accurately.

First, we remain concerned that the ridership estimates for the five options on the Trail continue to include riders from beyond the half-mile limit in violation of accepted transportation planning standards despite repeated efforts to point out this error by the Town. In response to enquiries, MTA replied that it had adhered to "the model" but this vague answer suggests that it continues to include riders from outside the appropriate catchment area.

Second, the ridership estimates continue to assume a free transfer to Metro and fail to reflect that the cost of the transfer must be borne by either passengers—thus reducing ridership—or by the State—thus increasing operating costs. Again, though the Town has repeatedly pointed out this problem, MTA continues to assume a free transfer even though WMATA's current practice is to charge for intermodal transfers and FTA requires the analysis to reflect the current practice. In addition, the model fails to follow standard industry practice of including time penalties for transfers. Such penalties account for the amount of time it takes to complete a transfer—including wait time—plus the added inconvenience and anxiety associated with transferring.

Third, there are two significant costs to be borne by the County which appear to be outside the Purple Line cost estimates, raisings questions as to the true costs of the Purple Line. One is the $60 million southern elevator connection at Bethesda Metro. MTA fails to include costs for the elevator in its budget for the master plan light-rail options and it is unclear what credit the County will get for providing this needed amenity. Yet, the costs to put a new Metro connection at National Naval Medical Center are included in that alignments' budget pushing the costs of the Jones Bridge Road option up. The other is the cost for building the Trail–we've heard estimates between $12-14 million—which the DEIS states will be borne by the County. Those costs are not easily isolated in the Purple Line budget and it is unclear if the estimated costs include the many long ramps, grading, retaining walls and landscaping in their analysis. The EIS should contain an accurate estimate of costs and benefits and the County should know exactly what it is committing to.

Despite MTA's best efforts to produce favorable numbers for the light rail options on the trail, these options remain like horses which barely qualify for a race and have little chance of finishing in the money—or receiving federal funds. If we really want to move the Purple Line forward, MTA and the EIS need to take a more serious look at the Jones Bridge Road option and

to optimize it correctly. The projected growth of the Woodmont Triangle, the BRAC process, and the enormous growth of the National Naval Medical Center make this imperative.

MTA has repeatedly explained that it has relied on the accepted Council of Governments model in estimating ridership. However, MTA has amazingly relied on a pre-BRAC version of this model. If the changes caused by BRAC were minor, this wouldn't matter much. However, BRAC is going to produce enormous increases in traffic. The Purple Line is an ideal opportunity to address this problem by providing a one-seat ride to Medical Center and Bethesda.

Yet, MTA has not optimized this option. Unbelievably, MTA's estimates have the supposedly optimized version of Bus Rapid Transit on Jones Bridge Road running at a slower speed than the slowest local bus on the same road today. MTA also has not done a reasonable study of traffic signal priority for this alternative, which is a key feature of Bus Rapid Transit. Moreover, MTA still has this option taking a slower path than any of the other options east of Jones Mill Road.

Finally, the DEIS repeatedly states that the Trail was purchased as a "transitway" and in the Master Plan. Reality is far cloudier. The formerly little-used train right-of-way was purchased as part of the "Rails to Trails" program. The Montgomery County Master Plan calls for a one-lane trolley—not the two-lane light rail proposed by the Purple Line. And the $10 million used to purchase the Trail includes the segments now part of the Capital Crescent Trail between Bethesda and DC. Does MTA claim that this portion of the Trail is also reserved for a future light rail network as well?

Thanks again for providing myself and the Town the opportunity to participate in this process. Instead of promoting an option which wrecks two parks—the Capital Crescent Trail and Woodmont Plaza—for the price of one light rail, the EIS needs to reexamine the Jones Bridge Road Bus Rapid Transit option so that we can get two transit lines—the Purple Line and Corridor Cities Transitway—for the price of one.

- RECORD #1175 DETAIL

First Name :	Council Member Leta
Last Name :	Mach
Business Name :	City of Greenbelt
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	I am a Council member from the City of Greenbelt. I'm here speaking in support of the purple line light rail from New Carrollton to Bethesda. I agree with the previous speaker. I don't really have too much more to add, but I just want to emphasize that the purple line will offer high quality, fast and dependable, as well as environmentally friendly transportation. I want to note once again that I said I want, am looking for a purple line from New Carrollton to Bethesda. Given some of the controversy on the western end, it will be much easier to get purple line now if we start in Prince George's County. Thank you.

- RECORD #1101 DETAIL

First Name :	Council Member Jonathan
Last Name :	Molinatto
Business Name :	City of College Park
Address :	5210 Huron Street
City :	College Park
State :	MD
Zip Code :	20740
Email Address :	
Submission Content/Notes :	Dear Maryland Transit Administration, As an elected official, resident, and student in College Park, MD, I must write you to share my enthusiastic support of the Purple Line, specifically the Light Rail option. Bus Rapid Transit has some draw, but to reach maximum ridership, I believe LRT is the way to go. It will also tie nicely into the Metro stops, giving people more of a feel of continuity. Thank you, Jonathan Molinatto

- RECORD #848 DETAIL

First Name :	Mayor Adam
Last Name :	Ortiz
Business Name :	
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : Exactly. So, good morning and welcome back to Inner Beltway Prince George's County. My name is Adam Ortiz. I'm the Mayor of Edmonston, a small municipality not far from here and one just a stone's throw from the projected Purple Line, at least as it's outlaid out in the hallway.

I just wanted to say on behalf of the people of Edmonston and our Town Council, we are strong supporters of the Rail System. We're beginning to refer to it as the "Green, Purple, People Moving Machine" in our town and we hope that it comes from being more than just a dream but truly in to fruition.

One of the things that we find is that our people are among some of the hardest working people in the State of Maryland. We have limited means. My town, in particular, is a working class town. We're mixed race. I would say that we're mixed income but we don't have any rich people. We're just all working class folks and some of us have transportation but many of us do not.

Yet, you know we find a way to get to work one way or the other. One of our staff people, my Assistant Town Clerk in town, she lives in Wheaton. It takes her approximately and hour and twenty-five minutes every day to get from Wheaton to Edmonston.

Whereas by car, it's probably about between 15 and 20 minutes and she takes a convoluted network of rail, bus, and walking to get to our town. I'm just pulling her out, but she's illustrative of hundreds of people in my town, thousands of people in this region that are looking for better transit options.

I strongly support and we strongly support the rail option because we feel that the bus option isn't really an option at all. In fact, it's not even a half measure it's almost no measure because it gets us stuck into the same sort of problems that we've always had.

It does not move people efficiently, it is not as green as it should be. It is more inconvenient and it takes a very long, long period of time.

Here in Prince George's County we often feel that many of the large projects by State Highway go outside of the Beltway to where the people aren't. 270, the Inter County Connector. We're asking you to invest where the people are.

We're one of the densest regions in the state. We're one of the hardest-working regions in the state and we deserve the resources here and we urge you to put the resources here to serve the people here where the people are and we are here and we do need your service.

One of the biggest objections that we hear over and over again is that country club out in Montgomery County. And I'm going to not speak in my capacity as a Mayor but speak in my capacity as a really bad golfer.

That if one is so concerned about one's golf game that they're worried about hitting a train off the fairway, then they might want to consider racquetball because this doesn't seem to be the sport for them. And the greater good is so clearly served by a Rail Purple Line in the Beltway.

Furthermore, and I'm going to echo I'm sure something other people have said from time to time, we hope it starts here in Prince George's County. Again, we feel that many projects serve other people and other places. We're hard-working here. We're densely populated. We're transit friendly and we need the project to begin here.

So we do ask you to keep our voices in mind today and in the other sites in this area, Inner Beltway Prince George's County. That we do strongly support the Rail Option and that we do look forward to this Green, Purple, People Moving Machine. Thank you.

- RECORD #1323 DETAIL

First Name :	Council Member Sharon
Last Name :	Scott
Business Name :	Town of Kensington
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	It's Sharon, S-H-A-R-O-N, last name Scott, S- C-O-T-T. And I'm here for the town on Kensington. I'll keep my statement very brief. Get me closer, huh, okay. I'll make my statement very brief. I think we have a unique chance here to do what's really right for the community because we haven't already done it wrong. We haven't torn down the trees, we haven't made a decision, and I think the right decision for all the people with the BRAC issues, the people trying to get there for medical care, is to really look at the bus route more closely. I've never figured out why the Purple Line was going to terminate in south Bethesda. There's no metro there, there's no reason to terminate it there, and I really think we should look at a place where it can connect to metro. We should save our trail. And that's it. Thank you.

- RECORD #2247 DETAIL

First Name :	Council Member Katherine
Last Name :	Sharpe
Business Name :	Town of Riverdale Park
Address :	4800 Ravenswood Road
City :	Riverdale
State :	MD
Zip Code :	20737
Email Address :	
Submission Content/Notes :	
Attachments :	Sharpe_Katherine.pdf (451 kb)

Purple Line

MTA Maryland

Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Katherine Sharpe Organization: Town of Riverdale Park

Address: 4800 Rowerswood Rd

City: Riverdale State: MD Zip Code: 20737

I/We wish to submit the following comments on this project: I am a Councilwoman for Ward Two in Riverdale Park, and I'd like to reiterate the strong support for the Purple Line among my constituents. The Town officially supports the High Investment LRT alternative, with the caveats that we would prefer an aerial structure over the Kenilworth Ave intersection, and we would like the River Rd station located at the River Rd/Riverdale Rd intersection.

- RECORD #1319 DETAIL

First Name :	Mayor Kathy
Last Name :	Strom
Business Name :	Town of Chevy Chase
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : Kathy, K-A-T-H-Y, Strom, S-T-R-O-M. Can I submit a copy of my written comments? Thank you. Good evening and thank you. I am Kathy Strom, a member of the Town Council and Mayor of the Town of Chevy Chase. The town is an incorporated municipality, a community of about one thousand households. We appreciate the opportunity to present our comments on the Purple Line AADEIS to the Maryland State Transit Authority.

We will be submitting a formal written response prior to the close of the comment period which ends January 14th and tonight we'll highlight a few of the issues of concern to us.

We believe that the AADEIS does not adequately or fairly consider the Purple Line alternative of using bus rapid transit on Jones Bridge Road, an alternative that could provide, potentially, tremendous and cost effective benefits to the region.

In particular, the Jones Bridge BRT alternative would facility east-west transit in the southern part of Montgomery and Prince George's counties at a cost of at least a half a billion dollars less than the other Purple Line alternatives. It would address the transportation and traffic problems posed by the relocation of the Walter Reed facility to the Navy Medical Center in Bethesda, all while protecting an important and vital green space, the Capitol Crescent Trail, so important in this urban part of the county.

For these critical reasons, the town of Chevy Chase renews its request to MTA to modify the study of the Jones Bridge Road Bus Rapid Transit Alignment. The low cost bus rapid transit alternative, build alternative under consideration, so that the public can assess in a fair and equitable way the potential benefits of this alternative.

The town's consultants continue to find technical deficiencies, omissions and inexplicable assumptions in the AADEIS analysis of the BRT option, despite numerous discussions of this failings with the state. Thus, the state's own actions demonstrate a bias in its analysis of this alternative.

This alternative presented to the public ignores improved routing and traffic signal priority treatments that the state assumes for other alternatives, as well as dedicated lanes, which would make this alignment into a true BRT with reduced running times likely to maximize ridership.

While this alternative may potentially provide a win-win for the region, we will never know unless the public has been given the option of an informed comparison. While the state has engaged in dialogue with the town, we are disappointed to find that the public has still not given the complete picture in the DEIS and in this regard, MTA has done Maryland tax payers, our local community, and the process a disservice.

The Jones Bridge Road Bus Rapid Transit Alternative is of crucial importance because it could potentially serve more jobs in the Bethesda area with a direct one-seat ride, 75,000 versus 35,000, because it can make stops at the National Naval Medical Center, North Woodmont, projected for high density growth, and Central Bethesda. Cost tax payers substantially less than the other alternatives, anywhere from 600 million to one billion less, making money available for other important transit projects in the region, like the corridor cities transit way. Help provide direct relief for the projected percent traffic increase anticipated on Jones Bridge Road due to the re-alignment of Walter Reed to Naval Medical Center, prevent the clear-cutting of over 15 acres of mature trees in an important down-county green space, the Capitol Crescent

Trail, maintain a wider, safer trail for all its multiple types of users and save the new heart of Bethesda, Woodmont East Plaza, from negative transit impacts, buses running through the plaza every 6 minutes or tail tracks with disabled transit trains parked in front of the Bethesda Landmark Theater.

The town has asked that the Jones Bridge Road Alternative be studied in its best possible and fully developed form as are the others, so that a fair and healthy debate of the issues can occur. Our consultants' best professional analysis reveals that the Jones Bridge Road Bus Rapid Transit Alternative could serve 56,000 people; the DEIS shows 40,000. And make the connection from Silver Spring to downtown Bethesda in 17 minutes; the DEIS shows 33 minutes. And that could be accomplished in the manner that will still allow it to be the lowest cost alternative. This alternative will still allow for the completion of the Capitol Crescent Trail to Silver Spring, it will be as clean as light rail and it will permit expansion of service as the line grows.

We know that some seek to avoid the issues we've raised by dismissing the town's concerns as selfish NIMBYism. We take issue with that. The town has repeatedly been an active and supportive member of the larger Montgomery County community. We applaud and participate in our region's commitment to the environment, we support the efforts of the County Executive and Council to be fiscally responsible and we support the nation's commitment to promoting public transportation. To that end, it's time to be creative and pragmatic to search for ways to get the biggest bang for the taxpayers' bucks, and not sacrifice green space in the process.

There's a better Purple Line, we urge the state to consider the Jones Bridge Road BRT alternative in a fair and more accurate manner so the public can properly access the value and benefits of this potentially win-win transit alternative for the region. Thank you.

- RECORD #2236 DETAIL

First Name :	Mayor Kathy
Last Name :	Strom
Business Name :	Town of Chevy Chase
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	
Attachments :	Wrttn Tstmny.K.Strom.pdf (2 mb)

TESTIMONY OF MAYOR KATHY STROM, TOWN OF CHEVY CHASE

November 18, 2008

Good evening. I am Kathy Strom, a member of the Town Council and Mayor of The Town of Chevy Chase. The Town is an incorporated municipality, a community of about 1,000 households. We appreciate the opportunity to present our comments on the Purple Line AA/DEIS to the Maryland State Transit Authority. We will be submitting a formal written response prior to the close of the comment period which ends January 14, and tonight will highlight a few of the issues of concern to us.

We believe that the AA/DEIS does not adequately or fairly consider the Purple Line alternative of using Bus Rapid Transit on Jones Bridge Road, an alternative that could provide potentially tremendous and cost-effective benefits to the region. In particular, the Jones Bridge BRT alternative would facilitate east-west transit in the southern part of Montgomery and Prince Georges Counties at a cost of at least half a billion dollars less than the other Purple Line alternatives and would address the transportation and traffic problems posed by the relocation of the Walter Reed facility to the Naval Medical Center in Bethesda, all while protecting an important and vital green space -- the Capital Crescent Trail so important in this urban part of the County.

For these critical reasons, the Town of Chevy Chase renews its request to MTA to modify the study of the Jones Bridge Road Bus Rapid Transit alignment (the low cost Bus Rapid Transit alternative, build alternative 6 under consideration) so that the public can assess in a fair and equitable way the potential benefits of this alternative. The Town's consultants continue to find technical deficiencies, omissions and inexplicable assumptions in the AA/EIS analysis of the BRT option, despite numerous discussions of these failings with the State. Thus, the State's own actions demonstrate a bias in its analysis of this alternative. The alternative presented to the public ignores improved routing and traffic signal priority treatments that the State assumes for all other alternatives, as well as dedicated lanes which would make this alignment into a true BRT, with reduced running times likely to maximize ridership. While this alternative may potentially provide a win-win for the region, we will never know unless the public has been given the option of an informed comparison. While the State has engaged in dialogue with the Town, we are disappointed to find the public is still not given the complete picture in the DEIS and in this regard MTA has done Maryland taxpayers, our local community, and the process a disservice.

The Jones Bridge Road Bus Rapid Transit alternative is of crucial importance because it could potentially:

- serve more jobs in the Bethesda area with a direct one-seat ride – 75,000 versus 35,000 (2030 MCOG projections) because it can make stops at National Naval Medical Center, north Woodmont (projected for high density growth), *and* central Bethesda;
- cost taxpayers substantially less than the other alternatives (anywhere from $600 million to $1 billion less) making money available for other important transit projects in the region, like the Corridor Cities Transitway;
- help provide direct relief for the projected 16% traffic increase anticipated on Jones Bridge Road due to the BRAC realignment of Walter Reed to National Naval Medical Center;
- prevent the clear-cutting of over 15 acres of mature trees in an important down-county greenspace, the Capital Crescent Trail;
- maintain a wider, safer Trail for all its multiple types of users; and
- save the new "Heart of Bethesda" – Woodmont East Plaza – from negative transit impacts, i.e, buses running through the plaza every 6 minutes or tail tracks with disabled transit trains parked in front of Bethesda Landmark Theater.

The Town has asked that the Jones Bridge Road alternative be studied in its best-possible and fully developed form – as are the other five – so that a fair and healthy debate of the issues can occur. Our consultant's best professional analysis reveals that the Jones Bridge Road Bus Rapid Transit alternative could serve 56,000 people (the DEIS shows 40,000) and make the connection from Silver Spring to downtown Bethesda in 17 minutes (the DEIS shows 33 minutes) and that could be accomplished in a manner that will still allow it to be the lowest cost alternative. This alternative will still allow for the completion of the Capital Crescent Trail into Silver Spring; it will be as clean as light rail; and it will readily permit expansion of service as the line grows in popularity.

We know that some seek to avoid the issues we have raised by dismissing the Town's concerns as selfish NIMBYism. We take issue with that – the Town has repeatedly been an active and supportive member of the larger Montgomery County community. We applaud and actively participate in our region's commitment to the environment; we support the efforts of our County Executive and Council to be fiscally responsible; and we support our nation's commitment to promoting public transportation. To that end, it is time to be creative and pragmatic, and to search for ways to get the biggest bang for the taxpayer's buck and to do so in a way that doesn't sacrifice needed greenspace in the process. There is a better Purple Line. We urge the State to consider the Jones Bridge Road BRT alternative in a fairer and more accurate manner, so that the public can properly assess the value and benefits of this potentially win-win transit alternative for the region.

- RECORD #2815 DETAIL

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Attachments :	TOCCPurple LineDEIS Comments.pdf (6 mb)

January 13, 2009

Diane Ratcliff
Director
Office of Planning
Maryland Transit Administration
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

RE: Purple Line Alternatives Analysis/Draft Environmental Impact Statement and Section 4(f) Evaluation

Dear Ms. Ratcliff:

Attached please find comments on the Purple Line Alternatives Analysis/Draft Environmental Impact Statement and Section 4(f) Evaluation from the Town of Chevy Chase.

Sincerely,

Kathy Strom

Kathy Strom
Mayor

Attachments

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January 13, 2009

BY OVERNIGHT MAIL

Diane Ratcliff
Director
Office of Planning
Maryland Transit Administration
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratcliff:

The Town of Chevy Chase submits the following comments on the Alternatives Analysis/Draft Environmental Impact Statement ("AA/DEIS") prepared by the Maryland Transit Administration ("MTA") on the Purple Line. The Town expressly reserves the right to join the comments which may be submitted by others on this AA/DEIS and to take appropriate action based on those comments.

The Town supports the Purple Line concept and believes an improved east-west transit connection will bring a variety of benefits to the region. The Town also appreciates the opportunity it has been afforded by the to comment on, and contribute to, MTA's analysis of the Purple Line alternatives. Nevertheless, the Town believes that the AA/DEIS suffers from a number of serious defects and, as a result, fails to serve the central purposes of an environmental impact assessment.

The purpose of the review process mandated by the National Environmental Policy Act ("NEPA") is to "insure that environmental information is available to public officials and citizens *before* decisions are made. . . . The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA." 40 C.F.R. § 1500.1(b). Accordingly, agencies must "rigorously explore and *objectively* evaluate all reasonable alternatives" and "[d]evote substantial treatment to each alternative

considered in detail including the proposed action so that reviewers may evaluate their *comparative* merits." 40 C.F.R. § 1502.14 (emphases added).

The AA/DEIS violates these precepts in numerous respects. First, the AA/DEIS fails to conduct a separate analysis of the environmental impacts of each alternative, which prevents reviewers from understanding the *comparative* environmental effects of the various alternatives. MTA repeatedly attempts to justify this failure by claiming that "all alternatives have very similar alignments and station locations, and as a result, the natural environmental impacts are not appreciably different between alternatives." AA/DEIS at ES-9 (chart). This is demonstrably incorrect. The Low Investment proposal for Bus Rapid Transit ("BRT") diverges from the Capital Crescent Trail ("CCT" or "Trail") at Jones Mill Road, and reaches downtown Bethesda via Jones Bridge Road ("JBR"), Rockville Pike and Woodmont Avenue. Thus, unlike all of the Light Rail Transit ("LRT") proposals, Low Investment BRT does not use the Trail west of Jones Mill Road. As a consequence, the environmental effects of this one alignment differ in important respects from the LRT alternatives, yet MTA has failed to identify and analyze those differences.

Second, the MTA did not undertake a full and fair evaluation of the Low Investment BRT alternative. The AA/DEIS fails to use optimal assumptions for this one alternative alone, thereby understating its ridership potential. It summarily dismisses the benefits of providing direct service to the campus of the National Institutes of Health ("NIH") and the National Naval Medical Center ("NNMC")—an area that is projected to grow faster than downtown Bethesda and that none of the other alternatives serves directly. As a result, MTA has failed to afford decisionmakers a fair basis for comparing the costs and benefits of this one alternative with the costs and benefits of competing alternatives.

Third, and conversely, MTA's analysis understates the costs of the LRT alternatives, while overstating their benefits. For example, MTA assumes that LRT along the Capital Crescent Trail will provide meaningful service to the NIH/NNMC campus via a connection to the Red Line in Bethesda, yet it fails to include the significant costs of the new Metro entrance that is essential to such a connection. Nor has it accounted for the full costs of implementing and maintaining the hiker/biker trail in the same right-of-way with double-track LRT. Indeed, if the full costs of the LRT alternatives are included, it is doubtful these alternatives would meet the Federal Transit Administration's ("FTA's") requirements for funding. And it appears that MTA has overstated the ridership potential for LRT by including business and residential areas that are outside the standard FTA walking zones.

The pervasive bias that infects—and undermines the validity of—MTA's comparative analysis of the Purple Line options appears to be the result of a rigid and mistaken reliance on the Montgomery County Georgetown Branch Master Plan Amendment (approved and adopted January 1990) ("Master Plan"). In the AA/DEIS itself, MTA repeatedly indicates that, in its view, the Master Plan dictates use of LRT on the Georgetown Branch portion of the CCT. In fact, the Master Plan recommended a significantly different single-track trolley, with different environmental and neighborhood impacts. More fundamentally, the Master Plan based this recommendation on facts and assumptions that have changed dramatically in the intervening 19 years. As a consequence, the Master Plan cannot excuse MTA's failure to optimize the JBR alignment in the manner necessary to afford decisionmakers a fair basis for comparing the respective Purple Line options.

Finally, the AA/DEIS lacks a socio-economic analysis of the potential growth and development impacts of the Purple Line. A central premise of the project—indeed, one of its

justifications—is that it will spur additional economic growth and development. Yet the AA/DEIS fails to identify and analyze the environmental impacts that such growth will inevitably spawn.

The Town is unable to identify all of the shortcomings and defects in MTA's analysis at this time, as much of the detailed data underlying MTA's calculation of the costs and benefits of the various alternatives is not set forth in the AA/DEIS or the accompanying technical reports. As MTA has failed, despite repeated requests, to provide this information, the Town has submitted a formal request under state law to obtain this data, and reserves the right to supplement these comments when MTA responds to that request.

I. THE AA/DEIS REFLECTS A RIGID AND MISTAKEN RELIANCE ON THE MONTGOMERY COUNTY MASTER PLAN.

The analysis set forth in the AA/DEIS is marred by a pervasive bias against one of the six Purple Line alternatives—Low Investment BRT. As the Town explains in detail below, that bias is reflected in, among other things, MTA's failure to recognize and analyze the different, and less severe, environmental impacts of Low Investment BRT; its failure to optimize the operation of this one alternative and to recognize the significant benefits this option offers; and MTA's repeated use of differing and improper assumptions that handicap this one option, while inflating the benefits and understating the costs of the five other alternatives that are routed on the CCT. This bias appears to have its genesis in MTA's mistaken view that the Master Plan mandates use of the LRT alternatives on the Georgetown Branch. Of course, even if the Master Plan included such a mandate, MTA is still required to conduct a thorough and evenhanded analysis of non-LRT alternatives. But the Master Plan itself does not commit the County or State to the LRT alternatives that the AA/DEIS so clearly favors. Instead, the Master Plan recommends a very different single-track trolley configuration, does so on the basis of facts and assumptions that are

now out of date, and expresses environmental concerns that the AA/DEIS overlooks or brushes aside.

Months before the AA/DEIS was issued, the Town raised questions about MTA's approach to the Low Investment BRT alternative and whether it was studying the optimal version of this option, as FTA requires. *See* U.S. Dep't of Transp., Fed. Transit Admin., *Procedures and Technical Methods for Transit Project Planning* § 2.4, http://www.fta.dot.gov /planning_environment_2419.html (last visited Jan. 13, 2009) ("Each alternative should be defined to optimize its performance.") In response, MTA admitted that it had not optimized the Low Investment BRT alternative because it viewed this alternative as inconsistent with the Master Plan. That Plan, MTA stated,

> identifies the former Georgetown Branch right-of-way as a transportation corridor to be built for both a transitway and the permanent Capital Crescent Trail. The County purchased the right-of-way specifically for this purpose. An alignment along Jones Bridge Road, which the Montgomery Council has recommended against including in our study for the Purple Line, was developed as a lower cost option to using the County Master Plan alignment along the Georgetown Branch right-of-way and therefore, is part of the Low Investment BRT alternative. Medium and High Investment BRT would operate faster using the more direct and separate Master Plan alignment than along Jones Bridge Road, and so using a Jones Bridge Road alignment for those options would not compare favorably to . . . using the Master Plan alignment.

Letter from Michael D. Madden, Chief, Project Development, Office of Planning, MTA, to Hon. Linna M. Barnes, Mayor, Town of Chevy Chase (Feb. 25, 2008), at 3 (attached as Exh. 1).

The AA/DEIS likewise reflects MTA's view that the Master Plan dictates use of the LRT alternatives on the Georgetown Branch. Thus, the AA/DEIS states that "[o]nly the LRT alternatives support the Montgomery County Master Plan, *which calls for LRT between Bethesda and Silver Spring.*" ES-10 (Table: Summary of Key Evaluation Measures for Alternatives) (emphasis added). Indeed, MTA makes this assertion repeatedly. *See* AA/DEIS at ES-11

("[o]nly the LRT Alternatives support the Montgomery County Master Plan *which calls for LRT* with the permanent Capital Crescent Trail along the Georgetown Branch right-of-way") (emphasis added); *id.* (discussing "[t]he re-introduction of rail operations with the LRT alternatives . . . , as *called for in the Montgomery County Master Plan for several decades*") (emphasis added); *id.* at ES-13 (referring to the "re-introduction of rail operations with the LRT Alternatives . . . *called for in the Montgomery County Master Plan*") (emphasis added); *see also id.* ("the Jones Bridge Road alignment is not in the County master plans and as such, was never subject to the public review required under the master planning process").[1]

No such mandate, however, appears in the Master Plan. Instead, the Master Plan is careful to note that it provides "a set of comprehensive *recommendations and guidelines*," not mandates. Master Plan at vi (emphasis added). Indeed, it expressly states that its recommendations "are not intended to be specifically binding on subsequent actions," and for good reason—the Master Plan "look[s] ahead to a time horizon of about 20 years from the date of adoption," and specifically recognizes "that the original circumstances at the time of plan adoption will change over time, and that the specifics of a master plan may become less relevant as time goes on." *Id.* In fact, the Georgetown Branch Master Plan, which was last amended 19 years ago, recommends a different LRT configuration than those included in the AA/DEIS; does so for reasons that, as its authors presciently anticipated, are now out of date; and was written years before passage of the Base Relocation and Closure Act ("BRAC"), which will increase

[1] Indeed, after the AA/DEIS was published, State officials confirmed that MTA's analysis of Purple Line alternatives was significantly influenced by MTA's perceptions of what the Montgomery County Master Plan dictates. Thus, at a public forum, Transportation Secretary Porcari explained that Montgomery County has "done a great job over the years of treating [its] master plan almost as a religion and preserving right of way, directing development, encouraging growth where it belongs. If you look at what's going on in the EIS process with the Purple Line, we're actually trying to marry those things together, where we're trying to be consistent with the master plans." *See* Transcript of "Remaking The Suburbs in a Carbon-Constrained World: A Case Study of Maryland's Purple Line," The Brookings Institute, Washington, D.C., Dec. 3, 2008 ("Brookings Tr."), at 13.

jobs, visitors and traffic at the NIH/NNMC campus—an area that is not served directly by the CCT alignments.

A. The Master Plan Recommended A Fundamentally Different Single-Track Proposal To Achieve Objectives That The Current LRT Alternatives Would Actually Undermine.

The Master Plan recommends a "predominantly single-track trolley line." *Id.* at 9. The LRT alternatives discussed in the AA/DEIS, by contrast, are double-tracked. This difference is significant for several reasons, and undermines MTA's belief that the current LRT alternatives support the objectives of the Master Plan.

First, one of the reasons the Master Plan recommended a predominantly single-track trolley was because the County deemed a hiker/biker trail to be an equally critical use of the right-of-way. *See id.* at 1, 14. In the 19 years since the Master Plan was last amended, the popularity and use of that trail has grown dramatically. A May 2007 survey found that "[o]ver one million people use the popular Capital Crescent . . . and Georgetown Branch Trails each year," with an average of over 18,000 weekly users.[2] This "incredibly high" use[3] makes the CCT "one of the most heavily used trails in the country."[4] Nearly a mile of the Georgetown Branch right-of-way east of Woodmont Avenue, however, is only 32 to 66 feet wide. A double-track alignment significantly increases the portion of this narrow right-of-way dedicated to rail use and, in combination with the topographic extremes prevalent in this area, either leaves no space or correspondingly reduces the already limited space for a trail. This undermines one of the Master Plan's goals—*i.e.*, ensuring trail safety. *See, e.g.*, Master Plan at 3 (referring to "adequate trail width and safety"); *id.* at 53 (referring to potential "user conflict" on the trail and

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[2] Capital Crescent Trail/Georgetown Branch Trail Survey Report, Maryland-National Capital Park & Planning Commission, Dep't of Parks, May 2007, at 1 ("Capital Crescent Trail Survey").
[3] *Id.* at 5.
[4] Letter from Eric Gilliland, Director, Washington Area Bicyclists Ass'n to Mary Bradford, Director of Parks, Maryland-National Capital Park & Planning Commission (June 4, 2008) at 1 (attached as Exh. 2).

the need to provide "sufficient safety and convenience for trolley patron and hiker/biker uses"). Indeed, as the Town explains in greater detail below, MTA was still designing the narrow section of the right-of-way when it released the AA/DEIS, and thus did not—because it could not—demonstrate how the now enormously popular trail can safely co-exist with a double-track LRT alternative in this section of the right-of-way. In fact, the proposed LRT alternative will reduce trail width in this section below the Park and Planning Council's recommended 12-foot minimum, and in some places will likely eliminate the trail altogether, forcing trail users into the traffic of urban streets with no safety priority.

Second, the Master Plan recommended a predominantly single-track trolley in order to minimize "environmental disturbances to the existing right-of-way." *Id.* at 9; *see also id.* at 45-49 ("single track configuration limits construction, grading, and slope easement impacts to a minimum"). In particular, the Master Plan sought to "ensure that existing trees along the trolley/trail route are preserved wherever possible and that replacement of trees is of a sufficient quantity and quality to preserve and enhance the environment." *Id.* at 3. As the AA/DEIS recognizes, however, the double-track LRT alternatives would require the "remov[al] [of] essentially *all* of the trees within the narrower portions of the right-of-way," AA/DEIS at ES-13 (emphasis added), and these trees would *not* be replaced. *Id.* at 4-22, 4-41. Moreover, by more than doubling the width of the LRT footprint, the CCT alternatives will inevitably increase the "construction, grading, and slope easement impacts" that the Master Plan sought to keep "to a minimum." Master Plan at 45-49. Indeed, the Master Plan stressed that the trolley alternative was favored "primarily due to its ability to operate on a single track configuration," which results in "less grading[] and fewer construction impacts due to the narrower right-of-way needs." *Id.* at 119. Thus, in insisting that LRT alternatives "support" the Master Plan's "call for" LRT on the

Georgetown Branch, MTA ignores the critically different recommendation the Master Plan actually made, and the extent to which the LRT Purple Line alternatives directly conflict with, or undermine, the objectives the Master Plan sought to achieve through a single-track trolley.

B. The Master Plan Favored A Single-Track Trolley Over Bus Rapid Transit For Reasons That Are Now Outdated.

The MTA also ignores the extent to which technological changes over the last 19 years have undermined the central reasons the Master Plan recommended a single-track trolley over a "guided bus" option. The Master Plan deemed a single-track trolley "the best alternative because of its low noise and lack of noxious emissions," *id.* at 9, and because "light rail was . . . viewed as a more proven technology than the guided bus alternative." *Id.* at 119. The AA/DEIS itself recognizes, however, that the perceived deficiencies of 1990 BRT technology have been eliminated.

The AA/DEIS explains that BRT is a "versatile rubber-tired rapid transit mode that combines stations, vehicles, services, and guideway into an integrated system with a strong positive image and identity." AA/DEIS at ES-2. While the Master Plan expressed concerns 19 years ago with the "noxious emissions" of BRT, buses used in BRT systems today "are typically fueled with low emission hybrid electric motors or Compressed Natural Gas." *Id.* at 2-2. As a consequence, the AA/DEIS recognizes that BRT would result in less overall carbon dioxide emissions than LRT. *Id.* at 4-48.

Moreover, while the Master Plan favored a trolley because of concerns about BRT noise, MTA estimates that Low Investment BRT will cause fewer noise impacts than LRT. Specifically, MTA estimates that the BRT alternatives will have "moderate" noise impacts at only three sites, AA/DEIS at 4-55, compared to 14 to 18 "potential areas of wheel squeal annoyance" from the LRT alternatives—*i.e.*, "intense, high-pitched tones" that occur when trains

make sharp turns. *Id.* at 4-54 to 4-55. Two BRT maintenance facilities would result in only moderate noise impacts, whereas one LRT maintenance facility would result "in noise levels reaching the FTA severe impact threshold for nearby residential areas." *Id.* at 4-56. And MTA estimates no vibration impacts for Low Investment BRT, in contrast to LRT, which is expected "to produce vibration impacts above the FTA threshold along the Georgetown Branch right-of-way at three locations." *Id.* Indeed, MTA acknowledges that, "[w]ithin the Georgetown Branch right-of-way, structures located within 40 feet of the proposed LRT centerline coupled with light rail train travel speeds in excess of 35 mph are expected to experience vibration levels at or above the FTA 72 VdB impact threshold for Category 2 land uses." *Id.* at 4-56.

MTA's analysis, moreover, actually understates the noise impacts of LRT along the CCT. The DEIS fails to account for the fact that current plans for the LRT call for at-grade crossings for trail users, including many teens who use the trail to reach Bethesda-Chevy Chase High School. Not only does this raise greater safety concerns than those raised by less frequent and slower trolleys, it means LRT will have to include warning bells and train horns. *See* Statement of Samuel I. Schwartz, P.E. (Jan. 13, 2009) ("Schwartz Statement") ¶ 7 (attached as Exh. 3). These warning signals, in turn, will have to be loud enough to be heard by trail users far distant from trains approaching "speeds in excess of 35 mph." AA/DEIS at 4-56. MTA's failure to analyze these noise impacts is itself a serious defect in the AA/DEIS. Courts have held that the failure to consider mitigation for horn noise violates the "hard look" requirements of NEPA, and that "a reasoned discussion of [the agency's] rationale" is required before the agency can dismiss such impacts. *See Mid States v. Surface Transp. Bd,* 345 F.3d 520, 536 (8th Cir. 2003), affirmed by *Mayo Found v. Surface Transp Bd.*, 472 F.3d 545 (8th Cir. 2006).[5]

[5] Surface Transportation Board regulations also identify the importance of discussing noise impacts in environmental impact statements. *See* 49 C.F.R. § 1105.7 ("(6) Noise. If any of the thresholds identified in item

Thus, MTA's own analysis, as well as the frequent noise impacts that MTA's analysis ignores, demonstrate that the concerns about noise that led the County to favor a single-track trolley now weigh in favor of BRT technology, particularly the Low Investment BRT alternative, which avoids all use of the CCT west of Jones Mill Road.

Finally, while the Master Plan recommended a single-track trolley because it was "a more proven technology than the guided bus alternative," Master Plan at 119, the AA/DEIS acknowledges that BRT systems are now used in "many communities around the world." AA/DEIS at 2-2. "American cities such as Pittsburgh and Seattle have long benefitted from BRT, which can provide," among other things, "[h]igh quality service," "[h]igh-performance rapid transit service that can be quickly implemented," and "[m]edium- to high-capacity service" at "[l]ower capital cost." *Id.*

Thus, just as the Master Plan anticipated, "the original circumstances at the time of plan adoption [have] change[d] over time." Master Plan at vi. Technological advances have overcome every factor that led the County to disfavor BRT in 1990. And those same factors now favor use of BRT.

C. The Master Plan Was Written Before, And Did Not Anticipate, The BRAC Effects At NIH/NNMC.

The other "original circumstance[]" that has changed dramatically since the Master Plan was adopted in 1990 is the relocation of Walter Reed Army Hospital to the NNMC at the

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(5)(i) of this section are surpassed, state whether the proposed action will cause: (i) An incremental increase in noise levels of three decibels Ldn or more; or (ii) An increase to a noise level of 65 decibels Ldn or greater. If so, identify sensitive receptors (e.g., schools, libraries, hospitals, residences, retirement communities, and nursing homes) in the project area, and quantify the noise increase for these receptors if the thresholds are surpassed."). The thresholds identified in 5(i) are: "If the proposed action will result in either: (A) An increase in rail traffic of at least 100 percent (measured in gross ton miles annually) *or an increase of at least eight trains a day on any segment of rail line affected by the proposal*, or (B) An increase in rail yard activity of at least 100 percent (measured by carload activity), or (C) An average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on any affected road segment, quantify the anticipated effect on air emissions. For a proposal under 49 U.S.C. 10901 (or 10502) to construct a new line or reinstitute service over a previously abandoned line, only the eight train a day provision in subsection (5)(i)(A) will apply." *Id.* at § 1105.7(e)(5)(i).

intersection of Rockville Pike and Jones Bridge Road. According to MTA, this relocation will bring an additional 2,200 to 2,500 jobs (as well as an unspecified number of visitors) to the NNMC by 2011 alone, and employment around the Metro station that serves the NIH/NNMC campus is expected "to grow by over 6,000 jobs" by 2030. AA/DEIS at 1-10. Indeed, the AA/DEIS lists NIH and NNMC as two of the four largest employers in Bethesda, *id.* at 4-2. This is precisely the type of unanticipated and significant change that can render "the specifics of a master plan . . . less relevant as time goes on." Master Plan at vi.

The fact that the County purchased the Georgetown Branch right-of-way for dual use as a transitway and hiker/biker trail, AA/DEIS at 5-1 to 5-2, provides no basis for ignoring this significant demographic change. The County spent $10 million to purchase the 6.67 miles of the right-of-way between the District of Columbia border and Silver Spring. Approximately half of that right-of-way (between D.C and Woodmont Plaza in Bethesda) is already dedicated to trail use alone. Thus, the County spent $5 million for approximately 3.33 miles of right-of-way between Bethesda and Silver Spring that were to be used as both a hiker/biker trail and a transitway. This is hardly the type of significant "sunk cost" that can or should lock in an alignment that fails to provide direct service to a major employment center in the Purple Line corridor.[6] Indeed, this expense pales in comparison to the overall projected capital costs associated with the LRT alternatives that would use the right-of-way, which range from $1.2 billion to $1.6 billion. *Id.* at ES-10. In stark contrast, the total capital costs of the Low Investment BRT option would be approximately one billion dollars less.

[6] Under the Low Investment BRT alternative, which provides direct service to NIH/NNMC, the "sunk cost" is really around $3.5 million rather than $5 million. One of the three miles of right-of-way between Bethesda and Silver Spring (*i.e.*, the portion east of Jones Mill Road) would still be used as a dual transitway and trail, leaving only two miles that would not be used for the original dual purpose.

* * *

In sum, the Master Plan does not "call for" LRT on the CCT. Rather, it recommended a single-track trolley to achieve environmental and recreational benefits that the double-track LRT alternatives would affirmatively undermine. Technological advances have eliminated the disadvantages of BRT that led the County to endorse a single-track trolley in 1990, and the concerns over noise and vibrations that prompted that endorsement today favor use of BRT, which alone can provide direct service to a major employment center that the Master Plan failed to anticipate. Thus, properly understood, the Master Plan does not favor, much less mandate, use of LRT alternatives along the Georgetown Branch. And, as the Town explains in detail below, MTA's mistaken and rigid reliance on the Master Plan apparently led it to skew its comparative assessment of the LRT and Low Investment BRT options in a variety of impermissible ways.

II. THE AA/DEIS FAILS TO EVALUATE THE RELATIVE ENVIRONMENTAL IMPACTS OF EACH ALTERNATIVE.

Council on Environmental Quality ("CEQ") regulations provide that an EIS should "[d]evote substantial treatment to *each* alternative considered in detail including the proposed action so that reviewers may evaluate their *comparative* merits." 40 C.F.R. § 1502.14(b) (emphases added). The Federal Highway Administration has described this responsibility as requiring that:

> [a]lternative courses of action be evaluated and decisions be made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation; of the social, economic, and environmental impacts of the proposed transportation improvement; and of national, State, and local environmental protection goals.

23 C.F.R. § 771.105(b). An EIS is supposed to provide "a basis for comparing the environmental problems raised by the proposed project with the difficulties involved in the alternatives." *Dubois v. United States Dep't of Agric.*, 102 F.3d 1273, 1286 (1st Cir. 1996). It is

"absolutely essential to the NEPA process that the decisionmaker be provided with a detailed and careful analysis of the relative merits and demerits of the proposed action and possible alternatives, a requirement that we have characterized as the 'linchpin of the entire impact statement.'" *Id.* at 1286-87 (*quoting NRDC v. Callaway*, 524 F.2d 79, 92 (2d Cir. 1975)). Thus, while an agency "has discretion to balance competing concerns and to choose among alternatives, [ ] it must legitimately assess the relative merits of reasonable alternatives before making its decision." *Dubois*, 102 F.3d at 1289.

The AA/DEIS fails to undertake the required substantial and detailed treatment of *each* alternative considered. Instead, it repeatedly states that that "all alternatives have very similar alignments and station locations, and as a result, the natural environmental impacts are not appreciably different between alternatives." AA/DEIS at ES-9 (chart). This is demonstrably incorrect: the Low Investment BRT diverges from the CCT at Jones Mill Road. As a result of this divergence, the environmental impacts associated with the JBR alignment are different, and less severe, than those associated with the full CCT alignments. In addition, the AA/DEIS fails to undertake a complete comparative analysis of the different emissions impacts of the two different transit modes, LRT and BRT. As a consequence, the AA/DEIS fails to serve its central purpose of informing decisionmakers of the true comparative impacts of the LRT and BRT options under consideration. Indeed, there is already evidence that this failure is skewing public analysis of the Purple Line alternatives, as public agencies (and editorialists) are weighing in on proposals based on mistaken impressions created by MTA's incomplete analysis.

A. The Different Alignments Entail Different Environmental Harms.

Because of the different alignment of Low Investment BRT, it will have significantly fewer environmental impacts than all of the other "build" alternatives MTA studied. According

to MTA, Low Investment BRT will "not support the planned transit oriented development at Chevy Chase Lake." AA/DEIS at ES-10 (Summary of Key Evaluation Measures). MTA's failure to evaluate the full environmental impacts of this transit-enabled development—and to compare those impacts to the less severe effects of Low Investment BRT—is a significant defect in the AA/DEIS. Similarly, the AA/DEIS fails to recognize the significantly different impacts of the LRT alignments, which, unlike Low Investment BRT, will permanently denude a significant stretch of the Georgetown Branch Trail of all trees and canopy. And the AA/DEIS fails to analyze the deleterious impacts that the full Georgetown Branch alignments will have on the safety, utility and convenience of the hiker/biker trail.

1. Development at Chevy Chase Lake.

The AA/DEIS states that, due to the divergence in routes, the Low Investment BRT will "not support transit oriented development at Chevy Chase Lake." AA/DEIS at ES-10. MTA treats this as a disadvantage of the Low Investment BRT, noting that all LRT alternatives would support this "Key Evaluation Measure[ ]." *Id.* But under NEPA, MTA is required to evaluate the environmental impacts of this transit-enabled development so that it can be compared to the environmental effects of other proposals that will not foster such development. The AA/DEIS completely lacks this critical analysis.

CEQ regulations mandate an analysis of the "[i]ndirect effects" of a proposed action, which are those effects that "are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable." 40 C.F.R. § 1508.8(b). This includes "growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." *Id.* In addition:

> Effects and impacts as used in these regulations are synonymous. Effects include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial.

Id. In fact, "consideration of secondary impacts may often be more important than consideration of primary impacts." *City of Davis v. Coleman*, 521 F.2d 661, 676 (9th Cir. 1975).[7] "A conclusory statement that growth will increase with or without the project, or that development is inevitable, is insufficient; the agency must provide an adequate discussion of growth-inducing impacts." *Davis v. Mineta*, 302 F.3d 1104, 1122-23 (10th Cir. 2002). If an effect is "reasonably foreseeable" it should be considered. *Sierra Club v. Marsh*, 976 F.2d 763, 768 (1st Cir. 1992).

A transit-induced commercial development at Chevy Chase Lake is not merely a "reasonably foreseeable" secondary effect of the LRT alignments for the Purple Line. It is an expressly contemplated and *intended* effect. As noted, the AA/DEIS lists this very development among the Key Evaluation Measures for the Purple Line. AA/DEIS at ES-10.[8]

The environmental impact of this development is plainly not *de minimis*. A newspaper article reports that "[a]pproximately 250,000 square feet of commercial property owned by the Chevy Chase Land Company called Lake East, located between Manor Road and Chevy Chase Lake Drive on the east side of Connecticut Avenue, would be redeveloped to include a transit-

[7] The court further elaborated on this point by noting, "[w]hile the analysis of secondary effects is often more difficult than defining the first-order physical effects, it is also indispensable. If impact statements are to be useful, they must address the major environmental problems likely to be created by a project. Statements that do not address themselves to these major problems are increasingly likely to be viewed as inadequate. As experience is gained in defining and understanding these secondary effects, new methodologies are likely to develop for forecasting them, and the usefulness of impact statements will increase." *Id.* at 677.

[8] In fact, supporters of the LRT alignment have argued that development is not merely an intended effect but the *central purpose* of the Purple Line. *See* Brookings Tr. at 27 ("the transportation business is not to move people. It is not the purpose of a transportation system. The purpose of a transportation system is to build value, and the means by which you do that is by moving people. But it is around the stations that the value is being created, and unbelievable value is being created around those stations." (statement of Christopher Leinberger)).

oriented shopping center, small retail stores and office space, according to company president Edward Asher." *See* Andrew Ujifusa, "Purple Line Could Bring Redevelopment To Area," Gazette.net (Dec. 3, 2008), http://www.gazette.net/stories/12032008 /bethnew202539_32474.shtml. In addition, "[t]wenty acres of current residential areas could also be altered to include multi-family homes, as well as low- to moderately-priced residences." *Id.* Development on such a scale would inevitably entail environmental impacts that MTA is legally obligated to analyze.

Indeed, this development would be in close proximity to the Coquelin Run, which parallels the south side of the Georgetown Branch and is a major tributary of Rock Creek. *See* Purple Line, Natural Resources Technical Report (2008) at 2-22. The 1990 Master Plan recognized that, even without the proposed single-track trolley, stormwater management and water quality control were already issues for the Coquelin Run, and it expressed concern about the potential for a "high volume of urban pollution [entering] this tributary." Master Plan at 107-08. Development of a 250,000 square foot shopping and retail center, and increased housing density in a 20-acre area, will inescapably reduce trees and permeable surfaces in the Coquelin Run stream valley and increase stormwater runoff of urban pollution into the tributary. Yet the AA/DEIS includes no analysis of these impacts.

This failure is particularly problematic in light of the ongoing state and federal efforts to restore the Rock Creek watershed. In 1996 and 2002, Maryland identified that watershed as having poor biological conditions, nutrient impairments and sediment impairments. Natural Resources Technical Report at 2-22. Montgomery County has received money from the Maryland State Highway Administration to "address environmental impacts stemming from transportation-related construction," and the Rock Creek watershed and its tributaries are the

major focus of this funding. County Receives $2 Million Grant To Restore Rock Creek Watershed, Montgomery County, Maryland Press Releases, Sept. 14, 2000, http://montgomerycountymd.gov/mc/news/press/00-338.html. These watershed improvements are necessary to "help preserve the Chesapeake Bay." *Id.* In addition, as part of an "ongoing effort to improve water quality and habitat along the main stem of Rock Creek, the Montgomery County Department of Parks and Planning Department staff will reforest land in the stream buffer near Jones Mill Road, Beach Drive and East-West Highway," by planting "[a]bout 500, six-ft tall trees . . . on 2½ acres stretching along the west side of the creek." Montgomery Planning.org, Forest Conservation Program, http://www.mcparkandplanning.org /environment/forest (last visited Jan. 6, 2009). And the National Parks Service began a fish-passage restoration effort in 2003, and "[i]n Rock Creek National Park, six fish barriers are being removed or modified, while two more are being remedied in the adjacent National Zoological Park." Rock Creek Park News Release: Partnership Project to Restore Fish Passage to Rock Creek Begins, National Parks Service, U.S. Department of the Interior, Dec. 22, 2003, http://www.nps.gov/archive/rocr/fishpass.htm. These efforts are being made to enable anadromous fish to once again spawn in Rock Creek.

Given the existing and well-documented environmental problems in the Rock Creek watershed, and the improvements already underway to help restore fish habitat and preserve the Chesapeake Bay, it is essential that any study of the Purple Line's environmental impacts include a detailed analysis of the effects of a transit-induced development near the Coquelin Run. Instead of performing that analysis, however, the AA/DEIS lumps all of the build alternatives together and asserts that, although all "have the potential to increase existing surface water impairment to some degree, the relatively small amount of new impervious surfaces and related

pollutants that the project would add to the highly urbanized setting of the corridor would be expected to cause only minimal changes, if any, in corridor water quality." Natural Resources Technical Report at 2-32. This conclusory assertion fails on its own terms to meet NEPA's requirements: MTA's "analysis" of water quality impacts consists almost entirely of a recitation of existing conditions and a listing of "common" runoff contaminants. *See id.* at 2-22 – 2-29, 2-31. What is required—and what the AA/DEIS manifestly fails to provide—is the "detailed" and "thorough" analysis of the environmental impacts of each alternative necessary to explain *why* MTA believes construction of a transitway in this watershed will likely cause only minimal changes.

This defect alone is serious and must be corrected. But the more fundamental problem is that MTA plainly has no basis for repeatedly asserting that the environmental impacts of the various Purple Line alignments are comparable, when it has completely failed to analyze the impacts of real estate development at Chevy Chase Lake that will be fostered by the LRT alignments, but not by the Low Investment BRT. As a result of this omission, the AA/DEIS fails to serve its central purpose of "insur[ing] that environmental information is available to public officials and citizens *before* decisions are made," 40 C.F.R. § 1500.1(b), "so that reviewers may evaluate the[] *comparative* merits" of different alternatives. *Id.* § 1502.14(b) (emphases added); *see also Dubois v. United States Dep't of Agric.*, 102 F.3d at 1286-87, 1289 ("detailed and careful analysis of the relative environmental merits and demerits of the proposed action and possible alternatives" is "absolutely essential to the NEPA process," as it enables officials and the public to "legitimately assess the relative merits of reasonable alternatives before making its decision.").

And this failure has already skewed public debate. Not only has the AA/DEIS prompted newspapers and other organizations to take public positions on the preferred alignment without a full understanding of all comparative environmental impacts, but the staff of the Montgomery County Planning Department relied on MTA's erroneous claim of "comparable" impacts when it recommended an LRT alignment. As part of its recommendation, the staff stated that "impacts to protected natural resources in the Purple Line study area are generally comparable for each of the alternatives analyzed." Montgomery County Planning Department: Move/Transportation Planning Division, *Purple Line Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) - Study Review and Recommendation on Locally Preferred Alternative*, "Preferred Purple Line Alignment" (Dec. 22, 2008) at 73 ("Montgomery County Planning Department Staff Recommendations").[9] This reliance by public agencies, editorial writers and others underscores why NEPA requires a complete comparative analysis, and why MTA's failure to perform that analysis is so injurious. Indeed, courts have recognized that there may be "cases of actual prejudice resulting from a deficiency in the DEIS, where, for example, omissions leave the agency without public comment on a material environmental aspect of a project and leave the relevant public without information about a proposed project." *National Comm. for the New River v. FERC*, 373 F.3d 1323, 1329 (D.C. Cir. 2004). The deficiency at issue here "may not be curable by the FEIS." *Id.*

2. Loss of Trees.

The AA/DEIS also fails to provide a detailed and careful analysis of the different environmental impacts that Low Investment BRT and the other build alternatives will have on the Georgetown Branch. This failure rests on a clear legal error, and likewise denies

[9] The staff did urge MTA to include, in the Final EIS, an examination of "the potential impacts to Coquelin Run from the *construction* of the light rail," *id.* (emphasis added), but likewise overlooked the secondary impacts to the watershed from the Chevy Chase Lake development.

decisionmakers and the public a complete understanding of the comparative impacts of the Purple Line proposals. This lack of complete information will also skew public consideration of those proposals, as the Montgomery County Planning Department staff recommendations once again illustrate.

By its own (albeit oblique) admission, MTA failed to analyze the comparative environmental impacts of the build alternatives on the Georgetown Branch. The AA/DEIS directs readers to the Preliminary Section 4(f) Evaluation Technical Report for a "detailed analysis of the potential impacts on the public parklands, recreation and open space resources." AA/DEIS at 4-14. But in that report, MTA states that, because it does not believe the Georgetown Branch Trail is a "Section 4(f) resource," the trail need not be analyzed further. *See* Purple Line, Preliminary Section 4(f) Evaluation Technical Report (2008) at 3-20; *see also id.* 4-14. This is plainly mistaken.

Section 4(f) requires an agency to make a heightened showing before the Secretary of Transportation can approve a transportation project "requiring the use of publicly owned land of a public park, recreation areas, or wildlife and waterfowl refuge." 49 U.S.C. § 303(c). Nothing in Section 4(f), however, overrides NEPA's requirements. Thus, even if MTA is correct that the Georgetown Branch Trail is not subject to Section 4(f)'s *heightened* requirements, NEPA still requires the AA/DEIS to conduct a detailed and thorough examination of the comparative environmental effects of the Purple Line proposals on that trail.

Instead of doing so, the AA/DEIS offers the following brief description:

> All of the Build Alternatives would have visual changes to the Interim Georgetown Branch Trail. The Purple Line would result in substantial visuals effects to the visual character of the Interim Georgetown Branch Trail due to the presence of the Purple Line in the Georgetown Branch right-of-way and the required clearing of trees and other vegetation for construction. While new landscaping would be included in the

> construction, the mature trees would not be replaced. The clearing of vegetation for construction would reduce screening of the right-of-way from neighborhood land uses.

AA/DEIS at 4-22. This bare-bones recitation dramatically understates the impacts of the LRT alternatives and, once again, misstates the similarities of the impacts from those proposals and Low Investment BRT.

As the Montgomery County Planning Department staff recognizes, loss of mature trees and the canopy they provide along a three-mile stretch of the Georgetown Branch is a significant environmental impact. While the County's longstanding plans to use the Georgetown Branch right-of-way for transportation may by dispositive of any Section 4(f) issues relating to the CCT, those plans do not alter the reality that the Georgetown Branch Trail is today used and enjoyed by nearly one million people annually, Capital Crescent Trail Survey at 1, and thus serves as "a critical link between the Capital Crescent Trail in Bethesda and the Metropolitan Branch Trail in Silver Spring," a "vital off-road connection to the Rock Creek Trail," and an "importan[t] . . . community resource," Montgomery County Planning Department Staff Recommendations at 68, 73. The Georgetown Branch Trail is also "an urban oasis for wildlife that has roamed outside of Rock Creek Park," and "provides a sense of urban escape" for the "[t]housands of citizens [who] use the trail weekly finding a respite and calm amongst the dense urban surroundings." Montgomery County Planning Department Staff Recommendations, App. C, "Comments on the Draft Environmental Impact Statement for the Purple Line (Dec. 9, 2008) at 3-4 ("General Comments").

The LRT alternatives will "result in the loss of all existing trees within the 66' wide corridor" that extends nearly a mile from Bethesda to the boundary of Columbia Country Club. *Id.*, App. C, General Comments, at 3-4. Planning Department staff estimate that, at a minimum,

this will result in a loss of at least six full acres of trees, and possibly many more due to "potential impacts on the critical root zones outside of the [right-of-way]." *Id.* at 4. The Town's consultants estimate that up to 15 acres of trees could be lost, Schwartz Statement ¶ 6, and an analysis by American Forests calculates an even larger loss of 17 acres. *See* Analysis Report, American Forests (attached as Exh. 4).

Planning Department staff recognize that even the destruction of six acres of trees will deprive trail users of shade over a significant stretch of trail, and deprive adjoining properties of the "privacy and noise abatement benefits" that these trees would otherwise provide. Montgomery County Planning Department Staff Recommendations, at 69. In fact, the effects of such tree loss are far broader and more significant. Trees "filter groundwater, slow stormwater runoff, help alleviate flooding and supply wildlife habitat. Trees cleanse the air, offset the heat generated by development and reduce energy needs. And in a less tangible sense, trees improve quality of life in a community by providing recreation and visual appeal." Montgomery Planning.org, Forest Conservation Program, http://www.mcparkandplanning.org /environment/forest (last visited January 6, 2009). Accordingly, the County has formally adopted a "mission" to "protect and enhance forest and tree resources in the County," and strategies "to increase the quantity of forest canopy, improve the quality of forests and trees, and protect and restore forest ecosystems throughout the County." Montgomery County, Dep't of Envtl. Prot., Trees are the Answer, http://mongtomerycountymd.gov/deptmpl.asp?url= /content/dep/Forest/tree_programs.asp (last visited Jan. 13, 2009). Indeed, as noted earlier, the Montgomery County Department of Parks and Planning Department will reforest 2½ acres in the stream buffer near Jones Mill Road, Beach Drive and East-West Highway "to improve water quality and habitat along the main stem of Rock Creek." Montgomery Planning.org, Forest

Conservation Program, *available at* http://www.mc-ncppc.org/environment/forest/index.shtm (last visited Jan. 6, 2009). The LRT alternatives, however, will remove a far greater number of acres of trees from the same Rock Creek watershed, yet MTA has undertaken no analysis to determine what effect this loss will have on the critical functions performed by trees—*i.e.*, the "filter[ing] groundwater, slow[ing] stormwater runoff, help[ing] alleviate flooding[,] . . . supply[ing] wildlife habitat[,] . . . cleans[ing] the air, offset[ing] the heat generated by development and reduc[ing] energy needs." *Id.*

Not only does MTA's cursory discussion of tree loss in the AA/DEIS fail to identify and analyze the full import of this loss, it fails to disclose the permanence of this harm. The AA/DEIS misleadingly refers to "the required clearing of trees and other vegetation *for construction*," AA/DEIS at 4-22 (emphasis added), thereby suggesting that the loss is temporary. But falling leaves can interfere with LRT catenary wires, and pose other hazards as well. *See* Schwartz Statement ¶ 6. Indeed, this past November, wet leaves caused a suspension of service on Baltimore's LRT Red Line, in a section of the line that follows "a narrow, old railroad right of way along the Jones Falls Expressway through forested parkland." *See* Michael Dresser and Brent Jones, Stopped Short, Leaves Trigger Braking Glitch, Halting Half Of Light Rail Indefinitely, The Baltimore Sun, Nov. 18, 2008 at 1A. Accordingly, all LRT alternatives require that the transitway remain "*permanently* free of virtually all trees that could provide canopy cover." *See* Schwartz Statement ¶ 6 (emphasis added). Because the AA/DEIS failed to explain the full extent of LRT's environmental impacts—and in fact was written in a manner that disguised those full impacts—the staff of the Montgomery County Planning Department believed that the deleterious effects of extensive tree loss could be minimized and mitigated; it therefore urged MTA to investigate techniques "to preserve/protect as many trees as possible."

Montgomery County Planning Department Staff Recommendations, at 69; *see also id.* at 73 (urging MTA to re-plant "larger canopy tress of varying species" along the Georgetown Branch Trail).[10] This is simply not an option, however, and public officials should not be making recommendations or decisions based on contrary misconceptions fostered by an AA/DEIS.

Low Investment BRT, by contrast, does not require the removal of any trees on the approximately 2-mile segment of the Georgetown Branch west of Jones Mill Road. Moreover, because falling leaves are not incompatible with BRT operations, this alternative does not require the permanent removal of canopy trees on the portion of the trail east of Jones Mill. Once again, therefore, MTA is plainly incorrect in concluding that there are no appreciable differences in the environmental impacts of the various alignments. Its failure to spell out these differences with respect to an environmental impact that the Montgomery County Planning Department has deemed significant is yet another critical shortcoming in the AA/DEIS.

3. Impacts on the Hiker/Biker Trail.

The AA/DEIS also fails to provide a detailed and careful analysis of the different impacts that Low Investment BRT and the other build alternatives will have on the hiker/biker trail on the Georgetown Branch right-of-way. All of the build proposals except Low Investment BRT would place a dual-track transitway in the portion of the Georgetown Branch where the right-of-way narrows to 66 feet, then narrows even more to pass through a tunnel under Wisconsin Avenue. The AA/DEIS completely fails to explain how the hiker/biker trail and transitway can safely co-exist in this section of the Georgetown Branch.

The 1990 Master Plan recognized the potential for "user conflict" on the trail and the need to provide "sufficient safety and convenience for trolley patron and hiker/biker uses."

[10] Apparently unaware of the necessity of permanent tree removal for the LRT options, the staff believed MTA had simply failed to propose mitigation or reforestation "[b]ecause trees do not count as a forest, and because the trail is not technically parkland." *Id.* at 73.

Master Plan at 53; *see also id.* at 3 (referring to "adequate trail width and safety"). In the 19 years since, the CCT's enormous popularity has led to these very types of user conflicts, particularly on the paved portion of the trail. In 2007, the Chair of the Capital Crescent Trail Coalition advised the Montgomery County Planning Department that "one of the most pressing issues along the trail was the safety of all of the trail users and avoiding conflicts and accidents among and between users, especially pedestrians and bikers." Kelli Holsendoleb, Capital Crescent Trail Coalition Recognized For New Research Findings On County's Most Popular Trail, Washington Running Report, July 28, 2007, http://mncppc.typepad.com/news /2007/07/capital-cresc-1.html. "Police reports and stories of actual crash victims paint a picture of the trail as a semi-chaotic place where collisions are rare, but hazardous when they do happen." Audrey Dutton, Cyclists, Pedestrians Paths Cross On Safety Of Trail, The Gazette.Net, Mar. 19, 2008, http://www.gazette.net/stories/031908/potonew203118_32365.shtml; *see also* The Capital Crescent Trail Coalition, Safety Is NO Accident, Courtesy Is Contagious, The Crescent (The Coalition for the Capital Crescent Trail, Bethesda, MD), Summer 2007, at 1, http://www.cctrail.org/index.html. (noting an "increasing number of serious accidents on the trail," including some involving "hospital convalesence and police investigations"). These accidents stem from the narrowness of this popular trail, which "squeeze[s]" cyclists "onto the trail with lower-speed walkers." Dutton, *supra.*

This increase in accidents recently prompted Park Police to post speed limits on the paved portion of the CCT south of Woodmont Plaza in Bethesda. Lori Aratani, Capital Crescent Trail Puts in Speed Limits to Slow Cyclists, The Washington Post, June 1, 2008 at C05. But trail users believe the most significant safety step would be to *widen* the trail. *See id.* Indeed, the staff of the Montgomery County Planning Department has now recommended that the trail be

widened, from the 10 feet proposed in the Master Plan to 12 feet, because the trail is "a regional resource and will feature heavy user volumes as it offers grade-separated connections for bicyclists and pedestrians to reach the Bethesda and Silver Spring transportation management districts." *See* Montgomery County Planning Department Staff Recommendations, at 69.

Because the trail is used by thousands of people each week (and is expected to be used by even more in the future), the question of whether a dual-track LRT or BRT option can safely co-exist with a heavily used trail in a narrow right-of-way is plainly an issue of considerable import. A careful and detailed analysis of this issue is therefore precisely the type of information that the public and decisionmakers need to have "before decisions are made," 40 C.F.R. § 1500.1(b), "so that reviewers may evaluate the[] comparative merits" of different alternatives, *id.* § 1502.14(b). The AA/DEIS, however, fails to provide this analysis.

Instead, the AA/DEIS simply states that the trail "would be built following Montgomery County standards for trail design, a 10-foot-wide paved trail with 2-foot shoulders," and that MTA has "set a *goal* of maintaining a landscaped buffer of approximately 10 feet between the trail and the transitway and, wherever possible, the trail would be built at a slightly higher elevation than the transitway." AA/DEIS at 2-9 (emphasis added). But MTA nowhere explains *how* this could be accomplished in a 66-foot right-of-way that includes within its boundaries a small stream. Nor does MTA explain how the "goals" and "standards" identified in the AA/DEIS could be satisfied in the even narrower portion of the trail that passes through a tunnel under Wisconsin Avenue.

This failure is particularly inexcusable in light of the Town's numerous requests, over the course of months, that MTA address these very issues. In connection with those requests, the Town repeatedly pointed out that MTA's schematics and drawings were inconsistent with the

constraints of the 66-foot right-of-way, and that MTA's suggested placement of a dual-track LRT and trail in the Wisconsin Avenue tunnel would require suspending the trail from the roof of the tunnel—a cramped and unsafe proposal that would require extensive and costly ramps in order to comply with the Americans with Disabilities Act. Apparently unable to respond to these legitimate concerns, and fully aware that they are matters of considerable public interest, MTA has improperly issued an AA/DEIS that does not even acknowledge much less address these issues, and that instead suggests that the trail can be built in accordance with County standards, but provides no evidence to support that suggestion. *See* Schwartz Statement ¶ 4.

NEPA simply does not permit an agency to "punt" on such issues. It requires a detailed and thorough evaluation. MTA must perform that evaluation, so that the public and decisionmakers can understand the full import of the dual-track Georgetown Branch alignments on the popular and important trail, and can compare those impacts with a proposal—Low Investment BRT—that would impose no constraints on the trail in the 66-foot right-of-way.

B. Failure To Properly Analyze Different Emissions Effects.

In addition to failing to recognize and address the different environmental impacts associated with the different build alternative alignments, the AA/DEIS also fails to properly analyze the potentially different emissions associated with the two different transit modes. Specifically, although the AA/DEIS recognizes that BRT vehicles can use natural gas, AA/DEIS at 2-2, its evaluation of emissions for the BRT proposals "is based on diesel buses which are heavier emitters than" buses using natural gas. Montgomery County Planning Department Recommendations, App. C, Green Section Comments at 5.

At the same time, although the MTA considers the amount of increased electricity load associated with an LRT and acknowledges that LRT will result in greater carbon dioxide

emissions than BRT, the AA/DEIS fails to acknowledge the full magnitude of LRT's larger carbon dioxide emissions. *See* Statement of David Salzman (attached as Exh. 5). Similarly, MTA fails to acknowledge that increased emissions from this additional load will result in even greater emissions of other pollutants, such as sulfur dioxide and particulates, than BRT will produce. *Id.* This failure is particularly serious, as one of the asserted justifications for the Purple Line, is to reduce overall emissions by inducing travelers to use mass transit rather than cars. The issue of comparative emissions associated with the two main modes of transit, therefore, requires further study as well.

III. THE AA/DEIS FAILS TO EVALUATE THE LOW INVESTMENT BRT FAIRLY AND REASONABLY.

MTA recognizes that "any transportation improvement must be a cost-effective investment," and that each alternative must therefore be "evaluated in terms of benefits produced compared to costs incurred." AA/DEIS at ES-6. The AA/DEIS, however, repeatedly skews its analysis of the costs and benefits of Low Investment BRT. On the one hand, the AA/DEIS analysis of Low Investment BRT fails to include the standard benefits of a "true" BRT, thereby understating the performance of this alternative. On the other hand, MTA assumes unnecessary "ideal condition" features that render this alternative more expensive, or more unacceptable to the affected communities. As a result, the AA/DEIS fails to "*objectively* evaluate all reasonable alternatives," including a realistically optimized Low Investment BRT alternative, so reviewers may "evaluate their *comparative* merits." 40 C.F.R. § 1502.14 (emphases added).

A. The AA/DEIS Does Not Fairly Evaluate Travel Times For Low Investment BRT.

The AA/DEIS unfairly evaluates the travel time of the Low Investment BRT alternative. The AA/DEIS recognizes that travel time is a critically important—indeed, potentially dispositive—factor in choosing between the various alternatives. It states that "the attractiveness

of the Build alternatives to the transit markets and the resulting user benefits would *primarily be a function of the travel time improvement differences among the alternatives.*" AA/DEIS at ES-7 (emphasis added). The AA/DEIS then concludes that the LRT alternatives would attract considerably more riders and new transit users than the BRT alternatives. *Id.* This critical conclusion, however, rests on MTA's improper practice of assuming optimal conditions for all 5 alternatives using the CCT, while assuming a variety of sub-optimal conditions for the Low Investment BRT alternative.

MTA's skewed analysis of relative travel times has already affected the recommendations of other parties. Indeed, the Montgomery County Planning Department has issued a staff recommendation in favor of the LRT alternatives based on these faulty assumptions. The staff found that "the travel time savings that can be attributed to the alignment along the Georgetown Branch right-of-way are a deciding factor in selecting a preferred alignment." Montgomery County Planning Department Staff Recommendations, at 62. Therefore, it is critical that these errors are brought to light and remedied before a Locally Preferred Alternative is selected.

The Town cannot identify all of the defects in MTA's travel time estimates until MTA makes clear what background data it relied upon for its conclusions. MTA must provide citation to any studies or scientific analyses it relies upon when determining the data estimates for each alternative. *See* 40 C.F.R. § 1502.24 (agencies "shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement"). Absent such information, MTA's assertions about traffic and travel time data cannot be fully assessed by those reading the AA/DEIS.

It is especially important that MTA provide such information here, because in many instances where it has revealed its assumptions and methodologies, it is clear that it has improperly handicapped the Low Investment BRT alternative. First, for Low Investment BRT, MTA assumed traffic signal priority ("TSP") facilities in unimportant intersections where there is no delay, yet did not do so at the crucial Connecticut Avenue and Rockville Pike intersections, where TSP facilities could provide meaningful reductions in travel times. MTA cannot simply refuse to include such travel-time savings in the AA/DEIS. Other cities have not shied away from difficult intersections with high volumes. Signal priorities are commonly used at busy intersections; indeed, signal priorities are used at busier intersections in larger and more congested metropolitan areas than these two intersections (*e.g.*, Wilshire Blvd in Los Angeles and Fordham Road in New York City). Schwartz Statement ¶ 8.[11]

MTA has elsewhere conceded that TSP facilities at Connecticut Avenue and Rockville Pike would increase the average speed of BRT along Jones Bridge Road to 14.8 mph, and would result in "substantial travel time savings" between Silver Spring and Downtown Bethesda. *See* Letter from Michael D. Madden, Chief, Project Development, Office of Planning, MTA, to Hon. Kathy Strom (Oct. 24, 2008), at 2 (attached as Exh. 6). But MTA asserted that these signal priorities would result in substantial delays to other traffic along Connecticut Avenue and Rockville Pike. *Id.* That assertion, however, rests on an MTA model that assumed a signal priority at these intersections of up to 105 seconds. *Id.* at 3. This allowance is an unheard of in the industry (the norm is usually 5 to 10 seconds), *see* Schwartz Statement ¶ 9, and appears to have been used to justify the conclusion that Low-Investment BRT is not an attractive alternative. MTA claims that this 105-second signal priority was necessary to achieve the higher

[11] According to the report documenting a signal priority pilot project on Victory Boulevard in Staten Island, new York, TSP decreased bus running times by approximately 17% in the morning and 11% in the evening. Schwartz Statement ¶ 8.

speeds and reduced travel time, Letter from Michael D. Madden to Hon. Kathy Strom (Oct. 24, 2008), at 2-3, but it fails to cite any studies for this conclusion or offer any analysis of more reasonable signal priority assumptions.

MTA's failure to include signal priority for Low Investment BRT at these important intersections is not only unjustified as a matter of standard industry practice, it is inconsistent with its treatment of Low Investment LRT. While the AA/DEIS assumes that for Low Investment BRT, signal priority would be implemented only "where possible," AA/DEIS at 3-3, for Low Investment LRT, signal priority would be included at "major intersections, where possible to achieve substantial time savings." *Id.* This places the Low Investment BRT alternative in an unfavorable light with no explanatory rationale.

Second, it is common practice for BRT systems to have bus priority lanes, but the AA/DEIS does not include them for the Low Investment BRT alternative. MTA deemed such lanes infeasible based on its assumption that they would require 21 feet of additional roadway width on Jones Bridge Road. *See* Md. Transit Admin., Assessment of "Analysis of MTA Purple Line Alternatives and Alignments" and Other Documents Prepared by Sam Schwartz Engineering at 14-16 ("MTA White Paper Response to SSE") (attached as Exh. 7).[12] The Low-Investment BRT alternative, however, would require roadway widening only between Connecticut Avenue and Jones Mill Road, and only by approximately 14 feet. This modest amount of widening, moreover, would take place entirely within the current right-of-way, which MTA documents estimate to be 90 feet between Connecticut Avenue and Jones Mill Road. In fact, other, more congested, cities have employed these priority lanes by widening roadways by lesser amounts than MTA assumes, and many cities have created bus priority lanes within the

[12] MTA's design also includes 10 feet of extra roadway width for bicycles and 6 extra feet for pedestrians where no such provision exists today. *See* MTA White Paper Response to SSE at 14-16. MTA has used these on-paper community amenities apparently to bulk up the roadway width and conclude that it cannot be done.

existing roadway. *See* Schwartz Statement ¶ 10 (describing use of bus priority lanes on Fordham Road and at Herald Square in New York City). Creating bus priority lanes within the existing roadway is a concept also known as a "road diet" and involves taking away travel lanes from cars with the result of decreasing the number of crashes and allotting road space to other uses. *Id.* at ¶ 11. Use of a road diet on Jones Bridge Road could create space for dedicated bus lanes without any widening of the roadway. *Id.*

MTA's insistence that the performance of Low Investment BRT can only be optimized using idealized but financially and/or politically unpalatable "greenfield" solutions, when less disruptive "brownfield" solutions are available and would result in system improvements, is yet another example of the agency's failure to undertake a fair and objective comparative analysis of the Low Investment BRT option. MTA has chosen to consider only total reconstruction of Jones Bridge Road, and then applied an all-or-nothing approach, leading to a quick dismissal of bus priority treatments based on the impact that the most idealized treatment would have on surrounding properties.

Not only is this insistence on "greenfield" solutions inconsistent with NEPA's requirements, it is inconsistent with the approach MTA has taken when analyzing the other build alternatives. For example, MTA has already demonstrated "brownfield" solutions are available with its design of Wayne Avenue in Silver Spring. The design for Wayne Avenue only widens the roadway by 15 feet (approximately 7.5 feet on either side).[13] MTA should apply this philosophy to the Low Investment BRT alternative as well.

Third, MTA likewise appears to have failed to include the benefits of another standard feature of BRT—queue bypasses. In its Technical Memorandum, MTA calculated that its recommended queue bypasses at Connecticut Avenue and at Rockville Pike (by themselves)

[13] MTA's website (www.purplelinemd.com) provides the relevant section drawings (Section EI).

would cut an average of 3-minutes and 40-seconds from the current running time of buses on Jones Bridge Road. MTA White Paper Response to SSE at 19-20. But it improperly failed to include this time savings in the DEIS in the estimated running times for Low Investment BRT along this segment, thereby increasing the travel time, and correspondingly depressing the ridership potential, for this alternative.

Fourth, as a consequence of MTA's biased assumptions, Low Investment BRT has slower running times than the existing local bus on Jones Bridge Road—even though any transit investment should, by nature, improve existing conditions. This anomaly is particularly glaring evidence of bias. MTA itself admits that current bus service is a "feeder/distributor-based network that is inadequate for corridor travel," because it is "choppy, disjointed, and operated by three essentially unrelated service providers," which results in "a lack of coordination and [a] route structure [that] is not suited for present day mobility needs." AA/DEIS at 1-6. By contrast, BRT is a "rapid transit mode that combines stations, vehicles, services, and guideway into an integrated system," which "collectively *improve* the travel time [and] reliability . . . of traditional bus transit." *Id.* at ES-2. The Low Investment BRT alternative would make fewer stops than the J1 bus; it has queue bypasses that should shave nearly 4 minutes from the existing condition during peak traffic conditions; it should benefit from even MTA's limited signal priority recommendations; and it should have faster loading/unloading times than regular buses as a result of platform-level loading, off-board fare pre-payment, and additional vehicle entry/exit doors. The fact that, under MTA's analysis, a Low Investment BRT proposal with all of these operational advantages is outperformed by the current disjointed and uncoordinated bus system confirms that MTA failed to optimize the assumptions underlying this proposal, and that its assessment of this alternative was impermissibly biased.

Indeed, if standard BRT treatments were used for the Low Investment BRT alternative, the travel time between Silver Spring and the Medical Center would be 12.5 minutes, as opposed to the 19.8 minutes that MTA calculates, and travel time between Silver Spring and downtown Bethesda would be 17 minutes, rather than the 25 minutes MTA calculates. Schwartz Statement ¶ 12. Given the critically important role that travel time plays in choosing between the various alternatives, MTA's biased assessment of the performance of the Low Investment BRT alternative denies decisionmakers the type of objective comparative data that an environmental impact statement must provide.

B. The AA/DEIS Does Not Fairly Evaluate the Base Realignment and Closure "BRAC" Benefits of Low Investment BRT.

The AA/DEIS also ignores the benefits of the Low Investment BRT alternative in addressing and mitigating the traffic and other impacts of the relocation of Walter Reed Army Hospital to the NNMC at Rockville Pike and Jones Bride Road. The AA/DEIS dismisses the idea that this significant base relocation should affect or change the analysis of the Purple Line. But MTA's reasons do not withstand scrutiny; indeed, they are frequently inconsistent with arguments and rationales the agency embraces in other parts of the AA/DEIS. MTA makes this into an either-or debate: the Purple Line can serve either the Bethesda area or the NIH/NNMC campus. Instead, MTA should focus on alternatives that serve *both* of these areas. At present, only the Low Investment BRT alternative provides direct access to NNMC and also serves the Bethesda population.

The relocation of Walter Reed will bring a significant influx of employees and visitors to this location. This relocation, therefore, implicates all of the Purple Line's central purposes—*i.e.*:

> increas[ing] transportation choices for people living and working in the region; improv[ing] the quality of the existing transportation system; support[ing] local plans for economic development, community revitalization, and transit oriented development; improv[ing] system efficiency and intermodal connectivity; and help[ing] the region address air quality issues.

AA/DEIS at ES-1.

Nevertheless, MTA dismisses the impacts of the relocation as "negligible." *Id.* at 1-10. In doing so, however, the AA/DEIS fails to specify the number of visitors expected after the relocation. The BRAC FEIS estimates that there will be 484,000 annual patients and visitors, totaling approximately 3,761 daily trips by patients and visitors to NNMC (as well as 5,000 daily trips by employees). BRAC FEIS Appendix C: Transportation Study, page 52.[14] By MTA's own calculation, moreover, the relocation will bring an additional 2,200 to 2,500 jobs to the NNMC by 2011 alone, and employment around the Metro station that serves the NNMC is expected "to grow by over 6,000 jobs" by 2030. AA/DEIS at 1-10 to 1-11.

By comparison, MTA projects an additional 5,000 to 6,734 jobs in the Bethesda Central Business District ("CBD") between 2000 and 2030. *See id.* at 1-11 (side-bar figure and Table 1-5). Thus, MTA's own numbers show that job growth at the NNMC will either be the same as, or even greater than, that projected for the Bethesda CBD.[15] In fact, MTA's projections for growth in the Central Business District are overinclusive for purposes of determining the benefits of the LRT alternatives. The job growth MTA predicts for the Bethesda CBD is possible only if it includes jobs in North Woodmont. This area, however, is more than a ½ mile from the terminus

[14] The number of trips to the Medical Centers would also likely increase after construction of the Purple Line. The low number of east-west transit trips to the Medical Centers today is partially a function of the absence of adequate public transportation. An infrequent bus service running only six hours daily is the only direct, east-west connection.

[15] In addition, because a large percentage of military personnel employees turn over every two to three years, a larger percentage of Medical Center employees can be expected to choose their residential locations based on the location of transit options than would normally be found for most employment centers. Thus, within two to three years of the opening of the Bethesda facility, virtually all the NNMC military employees will have made their housing location decisions based on the location of the new facility and the Purple Line will play a significant role in those decisions.

of the LRT alternatives in Bethesda, and standard industry practice assumes that potential riders will not walk more than 0.5 miles to use mass transit. *See* Schwartz Statement ¶ 13; *Transit Capacity and Quality of Service Manual* (2004). MTA should make clear that the Purple Line will *not* serve all of these jobs and residents.

MTA dismisses the job growth at NNMC as "negligible" by reasoning that "[t]he BRAC changes, while large, are a small percentage of the expected 72,000 jobs in the entire Bethesda CBD – Medical Center area in 2030." AA/DEIS at 1-11. But job growth of between 5,000 and 6,734 in the Bethesda CBD is an equally small a percentage of the expected 72,000 jobs for the entire Bethesda CBD – Medical Center area (if not a smaller percentage), and is therefore just as "negligible," if not more so, than the expected future job growth at NNMC.

Though it has not said so explicitly, MTA may reason that the Purple Line will serve the *existing* base of 34,833 jobs in the Bethesda CBD as well as the expected new growth, and that this total renders the job growth at NNMC negligible. There are several related problems with this reasoning. First, it is not an apples-to-apples comparison, because the AA/DEIS does not state what the existing base of jobs at the NNMC is. Assuming that the total of current and expected jobs is the relevant criterion, MTA would need to include the current number of jobs at NNMC before it could make any assessment of relative needs of the two areas. Second, elsewhere in its "description of each community and its social and economic demographics," the AA/DEIS highlights NIH and the NNMC as "[m]ajor facilities" of Bethesda, AA/DEIS at 4-4, a characterization flatly inconsistent with its dismissal of the projected job growth at these facilities as "negligible." Third, the mere fact that a CCT alignment provides a direct link to Bethesda does not mean it would serve all 34,000 existing jobs there. A substantial percentage

of these jobs are beyond the 0.5 mile radius traditionally used to determine who would use mass transit to reach a work location.

Nor is this the only internal inconsistency in MTA's effort to dismiss the impact of the "BRAC" relocation. In explaining the need for transportation improvements, the AA/DEIS notes that jobs are increasingly dispersed along the Purple Line corridor and cites, as an example, the relocation of the Food and Drug Administration in Rockville. If this job relocation, which is even farther from the Bethesda CBD than the NNMC, is properly considered when justifying the Purple Line, projected growth of 6,000 to over 8,000 jobs at the NNMC cannot be dismissed as irrelevant. Indeed, MTA tacitly concedes as much by claiming that the LRT alternatives provide "comparabl[e] or even better" service to the NNMC—an assertion that would be unnecessary if the relocation created only a "negligible" need for additional transportation services.

In addition—and perhaps most remarkably—MTA claims that the "impacts of BRAC on travel in the Bethesda area are notable more for the additional delays expected on area roadways than for the potential contributions to Purple Line ridership." *Id.* at 1-11. One of the *justifications* for the Purple Line is current heavy congestion on area roadways and projections of even heavier congestion in the future. Indeed, the statement of purpose and need refers to this problem repeatedly.[16] Thus, the very fact that the BRAC's most notable impact will be to exacerbate one of the problems the Purple Line is intended to address is evidence that a Purple Line alignment must serve this employment center. It is manifestly not a reason to dismiss the relocation as a "negligible" consideration.

[16] *See id* at 1-1 (identifying part of the project's purpose and need as addressing "[i]ncreasing congestion on the roadway system" and "[s]low and unreliable transit travel times on this congested roadway system"); *id.* ("The increasingly congested east-west roadway system does not have adequate capacity to accommodate the existing average daily travel demand, and congestion on the existing routes is projected to worsen as traffic continues to grow through 2030."); *id.* at 1-11 ("The inner suburbs, which include Montgomery and Prince George's Counties, will experience the greatest increase in congestion, and will continue to have the most congestion in the region.").

The failure of the AA/DEIS to adequately study and examine the effects of the Walter Reed relocation counsels in favor of creating a Supplemental Draft Environmental Impact Statement. An SDEIS is required when "[t]here are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts." 40 C.F.R. § 1502.9(c). "If there remains 'major Federal actio[n]' to occur, and if the new information is sufficient to show that the remaining action will 'affec[t] the quality of the human environment' in a significant manner or to a significant extent not already considered, a supplemental EIS must be prepared." *Sensible Traffic Alternatives and Haw. Res., Ltd. v. Fed. Transit Admin.*, 307 F. Supp. 2d 1149, 1167 (D. Haw. 2004) (alterations in original). An agency cannot simply rest on its laurels after initiating the NEPA process; instead, it must "continue to take a hard look at the environmental effects of [its] planned action, even after a proposal has received initial approval." *Friends of the Clearwater v. Dombeck*, 222 F.3d 552, 557 (9th Cir. 2000) (quotations omitted) (alterations in original). We urge MTA to prepare an SDEIS to properly analyze the effects of BRAC, to ensure that the public has all available necessary knowledge before a preferred alternative is selected.

IV. THE AA/DEIS UNDERSTATES THE COSTS OF THE LRT ALTERNATIVES.

The AA/DEIS also fails to conduct an objective comparative analysis of the Purple Line build alternatives by removing certain costs from the analysis of LRT alternatives, making them look artificially cheaper. This is an important defect for two distinct reasons. First, incorrect or incomplete cost information prevents a true comparison between all of the build alternatives presented in the AA/DEIS, as NEPA requires. Second, the discussion of various costs is directly relevant to the FTA New Starts analysis. Two of the primary considerations for FTA funding are the cost effectiveness of the project under consideration and the adequacy of local funding. The AA/DEIS itself admits this, noting that "[a]nother key variable [for the New Starts program] is

the local financial commitment, which focuses on the availability and reliability of local funding sources for capital construction and operating and maintenance costs." AA/DEIS at 5-7. In the Baltimore Red Line DEIS ("Red Line DEIS"), MTA recognized that, "[g]enerally, the lower cost (capital cost as well as operating and maintenance cost) alternatives have lower (better) cost effectiveness. This is true regardless of mode (the formula doesn't include mode in the calculation)." Red Line DEIS at 6-120. Given that MTA's estimate of the costs of the high-investment LRT alternative is already near the cap for the New Starts cost-effectiveness ratings, it is critical that cost estimates for these efforts be detailed and included in the Purple Line analysis.[17]

Most notably, the AA/DEIS does not include the costs of a new entrance at the Bethesda Metro station for the LRT alternatives. The AA/DEIS reasons that, while the new south entrance to the Bethesda Metro station is "related to the Purple Line alternatives," it is "funded separately and scheduled to be constructed independently," and therefore "no costs are assumed in the Purple Line capital cost estimates except for possible modifications to accommodate the Purple Line." AA/DEIS at 5-1.

This rationale does not justify excluding a significant cost component of the LRT alternatives. Indeed, elsewhere the AA/DEIS dismisses the importance of direct service to the NNMC via Low Investment BRT by asserting that the CCT alignments provide superior service via a transfer in Bethesda to the Red Line. *See* AA/DEIS at ES-7, ES-13. Under this logic, a new Metro entrance in Bethesda to link the Purple Line to the Red Line is "a critical element to achieve the travel time benefits for trips transferring to and from the Red Line" in Bethesda to reach the Medical Center. *Id.* at 5-2. If MTA is going to treat service to NNMC via a Red Line

[17] This is especially important because the capital cost and operating and maintenance cost estimates are in 2007 dollars, and the cost estimates will likely increase once they are in 2008 dollars. When the costs are converted to present dollars, the increased FTA breakpoints will be used, and those breakpoints increase by about $.50 per year.

connection as a benefit of the CCT alignments, then it must include the costs of the new Metro entrance necessary to achieve that benefit, regardless of who will be paying for it.[18]

This is particularly true because there is little, if any, reason to believe that a new Bethesda Metro entrance would be built independently of the Purple Line. The Master Plan specifically states that "[a] convenient, direct transfer from the Bethesda Terminal Station to the Metrorail system *is imperative*. Without a direct, close connection, projected ridership would be significantly reduced and the usefulness of the trolley would be clearly decreased. . . . The southern entrance is *essential to and an integral part* of the Bethesda terminal location and design." Master Plan at 51. Accordingly, if it is proper to exclude the costs of a new Metro entrance from the costs of the CCT alignments, then the AA/DEIS should also provide an alternate model to show the impact on CCT ridership if the new south entrance at the Bethesda Metro Station is *not* built.

The AA/DEIS also does not include the costs of trail construction and maintenance for the LRT alternatives. The AA/DEIS document deliberately excludes any discussion of the costs of trail maintenance, pushing all of those costs onto Montgomery County. The document states, "[w]hile the design of the Purple Line includes this parallel trail, it is assumed that a separate funding program would be undertaken by Montgomery County for implementation and maintenance of the trail (e.g., local or state funding sources)." AA/DEIS at 5-2. This point is made again on the next page: "The cost of operating and maintaining the hiker-biker trail built in conjunction with or adjacent to the Purple Line would be the responsibility of Montgomery

[18] MTA has also indicated that the CCT alternatives will all include enhanced bus service between Silver Spring and the Medical Center Area along Jones Bridge Road. MTA should indicate both: (a) the cost of such enhanced bus service, and show where that cost has been incorporated into the operating costs of the CCT options, and (b) why an enhanced bus service would benefit Jones Bridge Road, if MTA believes that the Low Investment BRT option along that road would *not* be a beneficial use of resources.

County, the owner of the Georgetown Branch Trail." *Id.* at 5-3.[19] These costs are likely to be significant, especially if there are problems with trail construction on the Georgetown Branch, because the dual-track LRT proposed in the document differs from the single-track trolley contemplated by the Montgomery County Master Plan. Given that the AA/DEIS repeatedly emphasizes that the trail will be available and even better after the Purple Line is complete, the AA/DEIS should also take into account the cost of such implementation and maintenance by the County.

V. THE AA/DEIS OVERSTATES THE BENEFITS OF THE LRT ALTERNATIVES.

The AA/DEIS repeatedly makes assumptions designed to make the LRT alternatives look better than realistically possible. As just noted, one example of this is costs: the document unreasonably minimizes the costs of LRT by excluding the costs of trail maintenance, the new Metro entrance and the costs of the enhanced bus service to the NIH/NNMC campus that MTA posits in conjunction with the LRT alternatives. Beyond costs, the AA/DEIS assumes the LRT alternatives will provide certain benefits, but does not adequately explain how this will happen.

For instance, in discussing ridership for the LRT alternatives, MTA improperly went beyond the 0.5 mile walking radius in determining who would be served by the CCT alignments. MTA corrected this mistake in its White Paper Response to SSE, so that its description of the CBD served by the Purple Line no longer included areas outside of the 0.5 mile walking radius. But that correction is not reflected in the AA/DEIS, which implies that the CCT alternatives serve the all jobs and employment in the Bethesda CBD. Thus, it appears that MTA's ridership model still includes ridership from outside the 0.5 mile walking radius for the CCT alternatives

[19] The Montgomery County Planning Department has recognized that this means "the cost of the trail is not included in the total project cost that is used to determine the cost-effectiveness rating. This strategy makes the transit project more competitive for federal funding, but places a greater burden on local governments to implement. planned multi-modal projects." Montgomery County Planning Board, Planning Board Work Session on Purple Line Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) at 7 (Nov. 24, 2008).

in downtown Bethesda, in violation of accepted transportation planning practice. It should be noted that MTA has also repeatedly failed to respond to the Town's requests for supporting documentation for MTA's ridership calculations so that this matter can be clarified.

The AA/DEIS also overstates the ability of the LRT alternatives to serve the NIH/NNMC campus after the Walter Reed relocation. MTA's claim of comparable or better service rests on a series of improper assumptions. First, in calculating the number of workers and visitors that will use the Purple Line to travel to the NNMC, the AA/DEIS improperly assumes that there will be no fare penalty associated with the transfer from the Purple Line to Red Line in Bethesda. FTA rules, however, require planners to assume that current transfer fare policies apply to new projects. The Certification of Technical Methods and Planning Assumptions document outlines that ridership forecasts should be:

> based on a single set of projections and policies consistent with the regional transportation plan and [ ] held constant for the preparation of travel forecasts for the New Starts Baseline and New Starts Build alternatives, including ... *pricing policies (fares*, highway tolls, and parking costs).[20]

MTA has stated that the Purple Line will be priced as a WMATA Metrobus. WMATA's current policy is to charge a transfer fare for all transfers from Metrobus to Metrorail and visa versa.[21] Metrorail charges by "distance" regardless of transfers and Metrobus offers a $0.90 round trip discount on trips that involve bus and rail. The failure to include this transfer fare improperly inflates Purple Line ridership and artificially increases the ridership gap between the CCT and Jones Bridge Road alternatives. If MTA used the Metropolitan Washington Council of Government regional travel forecasting model to determine the fare structure, it would not have assumed free transfers and could have provided accurate information on existing fares and, by

[20] United States Dep't of Transp. Federal Transit Admin. (2009), http://www.fta.dot.gov/documents/NSTemplatesFY2010.doc (emphasis added).
[21] WMATA Metrobus Fares, http://www.wmata.com/fares/metrobus.cfm (last visited Jan. 13, 2009).

extension, more accurate ridership estimates. Under the current WMATA fare policy, CCT passengers would pay $5.10 for a round trip fare to the Medical Center, as opposed to $2.70 for Bethesda- and Red Line-bound passengers. The "free transfer" assumption artificially generates additional trips to the Medical Centers for the CCT routing alternatives, which leads to an unrealistically favorable cost-effectiveness score for all CCT alternatives. Absent an agency-committed new fare structure, it is speculative to assume that a small increase in ridership from the Purple Line (compared to the existing 1.2 million daily WMATA riders) would stimulate a change in the existing integrated fare structure – especially considering that this kind of change would generate revenue losses on an already cash-strapped system.

The AA/DEIS also fails to include standard transfer penalties in its models and estimates. The AA/DEIS has understated the walk time required to transfer at Bethesda for all the CCT alternatives, and MTA failed to add walking time – perhaps as much as 5 minutes (plus associated penalties) – needed to reach the street from the Medical Center Metro Station via the deep escalator. Transportation planning standards recommended by the FTA impose a "public perception" penalty for transfers, as studies have found that transit users perceive transfer delays to be longer than they actually are. The Certification of Technical Methods and Planning Assumptions document for the New Starts program asks for "representations of walking, waiting, and transfer times."[22] No such penalty appears to have been imposed in MTA's analysis of the LRT alignments. Such transfer times also act as a deterrent to many potential riders. The industry-standard *Transit Capacity and Quality of Service Manual* (2004) provides average formulas for quantifying transfer time. One formula multiplies by 2.5 the time a passenger has to wait for the next connection. Another multiplies by 2.3 the actual walking time between

[22] U.S. Dep't of Transp. Fed. Transit Admin. (2008), http://www.fta.dot.gov/documents/NSTemplatesFY2010.doc.

vehicles. Using these multipliers more accurately represents the perceived total travel time to potential transit riders.

Lastly, the AA/DEIS does not recognize the benefits of future flexibility. One of the central justifications for the Purple Line is that the current transit network of Metro and feeder/distributor buses is locked into a radial commuting pattern and thus cannot accommodate, or be re-oriented towards, the east-west travel fostered by subsequent growth of jobs and housing in the suburbs. *See generally* AA/DEIS §§ 1.2.2.-1.2.3, 1.3.1. In other words, the need for the Purple Line has arisen because the current transit network is inflexible and cannot be adjusted to meet demographic changes that were not anticipated three decades ago, when the Metro system opened. The LRT alternative that MTA so clearly promotes in the AA/DEIS runs the risk of repeating this same problem: it is an inflexible, capital-intensive response to current needs that assumes that future needs over the next two and half decades will center on six activity centers. There is no guarantee, however, that future demographic changes will coincide with MTA's current projections; indeed, this point is underscored by changes that are already occurring and that the preferred LRT alignment will not serve directly—*i.e.*, the BRAC relocation at the NNMC and the relocation of FDA facilities in Rockville.

All BRT alternatives, by contrast, are much more flexible and less capital-intensive, and thus provide a significant advantage that the AA/DEIS ignores: the ability to adapt to unanticipated future changes in commuting/transit needs. Because it is far less capital intensive and can be deployed over existing roads, a BRT route can be readily and rapidly expanded or augmented through supplemental branch routes to meet new needs. By contrast, the far greater capital costs of LRT would effectively lock any LRT alignment into place, and would force the state to design a new or supplementary system to meet any unexpected future needs.

VI. THE AA/DEIS FAILS TO ANALYZE INDIRECT AND CUMULATIVE IMPACTS.

A. Failure to Analyze Indirect Effects.

As the Town explained above in connection with the Chevy Chase Lake development, where a project is completed with the intent to induce development, a discussion of indirect effects (including growth-inducing effects) is required. *See City of Davis*, 521 F.2d at 675 ("The growth-inducing effects of the Kidwell Interchange project are its raison d'etre, and with growth will come growth's problems: increased population, increased traffic, increased pollution, and increased demand for services such as utilities, education, police and fire protection, and recreational facilities."); *Coalition for Canyon Pres. v. Bowers*, 632 F.2d 774 (9th Cir. 1980) (EIS violated NEPA because it failed to discuss secondary effects of stretch of highway for neighboring towns and assumed pollution would increase inevitably). The discussion provided in the EIS must be "reasonably thorough." *Laguna Greenbelt, Inc. v. United States Dep't of Transp.*, 42 F.3d 517, 526 (9th Cir. 1994) (per curiam).

The Purple Line is intended "to support local plans for economic development ... and transit oriented development, and community revitalization." AA/DEIS at P-1; *see also id.* at ES-1 (same). Indeed, the AA/DEIS repeatedly cites this development as a central purpose of the project. *See id.* at ES-6 (an objective of Purple Line is to "[s]upport local plans for economic and community growth"); *id.* at ES-10 (Purple Line will "[s]upport potential for transit-oriented development at existing and proposed stations"); *id.* at ES-12 (BRT and LRT "better support the local plans for economic development and community development"); *id.* at 1-1 ("This transit project is intended . . . to support local plans for economic development [and] community revitalization"); *id.* at 1-13, Table 1-8 (project goals and objectives include supporting "development and revitalization of major activity centers" and "transit oriented development at

existing and proposed stations"); *id.* at 1-21, Table 1-9 (same); *id.* at 4-3 ("support of local economic development is one of the Purple Line goals"); Purple Line Socioeconomic Technical Report at 4-19 (the Purple Line "would provide transit supporting higher density, mixed-use development").

Given this objective, MTA was obligated to provide a "reasonably thorough" analysis of all of the Purple Line's growth-inducing environmental effects. *Laguna Greenbelt, Inc.*, 42 F.3d at 526. The Town has detailed above the AA/DEIS's failure to analyze the indirect environmental impacts that transit-induced development will cause at one location, Chevy Chase Lake. Comparable indirect effects, however, will spawned along the entirety of the proposed 16-mile route. Yet, the AA/DEIS does not remotely set forth the necessary "thorough" analysis of these effects. Instead, its "analysis" of indirect effects consists of the following:

> Indirect impacts to natural resources due to growth . . . are anticipated to be minimal, as most of the growth will occur in areas that are largely developed and zoned to accommodate the level of growth anticipated.

AA/DEIS at 4-92. This statement is plainly not a "reasonably thorough" analysis of all of the Purple Line's indirect impacts. Instead, it is precisely the type of "conclusory statement that growth will increase with or without the project, or that development is inevitable," that courts have flatly rejected as "insufficient." *Davis*, 302 F.3d at 1122-23.

B. Failure to Analyze Cumulative Effects.

In addition to an "indirect effects" analysis, the environmental impacts from future growth may also be a part of a cumulative impacts analysis. CEQ regulations define a cumulative impact as:

> [T]he impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can

> result from individually minor but collectively significant actions taking place over a period of time.

40 C.F.R. § 1508.7. The burden for providing information on other area projects/cumulative impacts rests with the agency preparing the EIS. *See City of Carmel-by-the-Sea v. United States Dep't of Transp.*, 123 F.3d 1142, 1161 (9th Cir. 1997) ("But the Federal Highway Administration and Caltrans failed first; they did not properly describe other area projects or detail the cumulative impacts of these projects.").

The AA/DEIS fails to satisfy this standard as well. It does not identify any past, present or reasonably foreseeable future actions, such as the Inter-County Connector ("ICC"), much less consider the cumulative effects from these projects. For example, there may be traffic implications on roads such as Connecticut Avenue as a result of the ICC, which would need to be considered in conjunction with any increased congestion caused by the development of Chevy Chase Lake.

Instead of considering such cumulative effects, the AA/DEIS simply says that planned development "is slated to occur regardless of the Purple Line," and that these developments are "consistent with their surrounding land uses and are consistent with regional and local master plans." AA/DEIS at 4-93. It concludes that the "minimal impact to resources resulting directly or indirectly from the Purple Line would be an incremental change to the cumulative effects experienced by these resources over the time frame studied." *Id.* Once again, such a conclusory assertion is legally inadequate. *See Davis*, 302 F.3d at 1122-23; *City of Carmel*, 123 F.3d at 1161 (rejecting agency's claim that a Master Plan provided a sufficiently detailed cumulative impacts analysis). Development may be inevitable or consistent with current zoning plans, and the impacts of the Purple Line may be incremental, but federal law requires MTA to analyze precisely these types of impacts.

Indeed, MTA's failure to undertake this mandatory analysis is particularly striking in light of its own recognition that commuting is oriented towards downtown Washington on radial arteries (such as Connecticut Avenue), and that area roadways are already suffering from congestion.[23] The ICC can be expected to increase traffic on the lower portion of Connecticut Avenue. *See* Walter Scott Public Comment on the Intercounty Connector (ICC) Draft Environmental Impact Statement (DEIS), Transportation Pitfalls of the ICC: A Review of the Travel Analysis Technical Report, February 25, 2005, at 5 (attached as Exh. 8). And all but one of the Purple Line alternatives is expected to foster development of new housing and retail development on this very road. This is precisely the type of "incremental impact" that, coupled with "past present, and reasonably foreseeable future actions," MTA is obligated to analyze. *Id.* Its failure to do so renders the AA/DEIS legally deficient.

We look forward to your response to our comments.

Sincerely,

/s/ Kathy Strom

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Chevy Chase, MD 20815

January 13, 2009

[23] *See* AA/DEIS at ES-1 (The Purple Line would help address "Slow and unreliable transit travel times due to the congested roadway system."); *id.* at 1-1 ("[T]he existing transit system is oriented toward radial travel in and out of downtown Washington, DC ... The increasingly congested east-west roadway system does not have adequate capacity to accommodate the existing average daily travel demand.").

Exhibit 1

Letter from Michael Madden to Town of Chevy Chase

February 25, 2008

MARYLAND TRANSIT ADMINISTRATION
MARYLAND DEPARTMENT OF TRANSPORTATION
Martin O'Malley, Governor • Anthony G. Brown, Lt. Governor
John D. Porcari, Secretary • Paul J. Wiedefeld, Administrator

February 25, 2008

The Honorable Linna M. Barnes
Mayor, Town of Chevy Chase
4301 Willow Lane
Chevy Chase MD 20815

Mr. Harris Schechtman
Associate, Sam Schwartz PLLC
611 Broadway, Suite 415
New York, NY 10012

Dear Mayor Barnes and Mr. Schechtman:

I am responding to your letter requesting various additional information and explanation from the Maryland Transit Administration (MTA) regarding the ongoing study for the proposed Purple Line. I understand that this information is being requested for analysis by the consultants under contract with the Town of Chevy Chase, Sam Schwartz PLLC. We are most willing to comply with this request as the information becomes available. Since the planning process for the Purple Line study is ongoing, much of the technical information remains in development or is continuing to be updated to reflect the latest definitions of the alternatives. This has delayed our submittal of these materials to you and Sam Schwartz PLLC.

It should be noted that the information being provided is in draft form and could be further refined and adjusted as we complete the ongoing Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS). The MTA's responses to the specific informational requests being made are presented below:

Issue 1: Projected travel times for each alternative
The travel times presented at the December 2007 public meetings were initial estimates, and these travel time projections have been revised to reflect several refinements in the alternatives in terms of the amount of dedicated and shared traffic lanes for the six build alternatives. Attached are the most recent travel time estimates from each station for the alternatives. These estimates are also subject further adjustments and they will be included in a Technical Report as part of the AA/DEIS upon its completion.

Issue 2: Average speed of trains
This information is not available at this time.

Issue 3: Projected fleet requirements
The total fleet requirements estimated for the bus rapid transit (BRT) alternatives are 80 BRT vehicles, and for light rail (LRT) are 40 LRT vehicles. These estimates are based on the current ridership projections and could be adjusted if future ridership projections change significantly.

Issue 4: Projected peak, mid-day, and evening ridership for weekdays and weekends
The ridership estimates are developed for the am and pm peak periods. As part of the AA/DEIS, non-peak ridership would also be provided, but there will not be a breakdown of off-peak by mid-day, evening or weekends.

Issue 5: Projected ridership generated by BRAC
The employment estimates associated with the Base Realignment Closure (BRAC) program whereby employees will be transferred from Walter Reed Army Hospital to the National Naval Medical Center (NNMC) are not fully included in the current ridership projections. The Purple Line AA/DEIS used the Metropolitan Washington Council of Governments (MWCOG) Round 7.0 2030 land use forecast for employment, households and population in the analysis.

However, the MTA has carefully studied issues and changes that would result from BRAC, especially since this concern has been raised by the public. Technical analysis has identified that approximately 60 peak hour transit trips could be added on the Purple Line as a result of jobs changing from Walter Reed to the NNMC based on home location of current employees of the Walter Reed facility. Our analysis reveals that based on the scale of the expected growth excluding the BRAC changes, analysis of the changing trip patterns for the 2030 horizon year indicates that the effects of BRAC in terms of the Purple Line will be negligible.

The effects of BRAC relative to the Purple Line will be discussed in the AA/DEIS. Attached is a draft assessment of BRAC on the travel assumptions for the Purple Line AA/DEIS.

Issue 6: Projected ridership breakdown for Bethesda passengers
This information is expected to be available at the time of our next round of public meetings, which are anticipated to be held in April 2008.

Issue 7: Projected capital and operating costs
The preliminary capital and operating costs for each alternative remain as presented at the December 2007 public meetings and as available through the project website. These estimates are continuing to be further evaluated and refined as part of the AA/DEIS development. More detailed and updated cost estimates will be available in a Technical Report as part of the AA/DEIS.

Issue 8: Medium and High Investment BRT alternatives
Medium and High Investment BRT options using the Jones Bridge Road alignment were not developed or evaluated for the Purple Line. The Montgomery County Master Plan identifies the former Georgetown Branch right-of-way as a transportation corridor to be built for both a transitway and the permanent Capital Crescent Trail. The County purchased the right-of-way specifically for this purpose. An alignment along Jones Bridge Road, which the Montgomery County Council has recommended against including in our study for the Purple Line, was developed as a lower cost option to using the County Master Plan alignment along the Georgetown Branch right-of-way and therefore, is part of the Low Investment BRT alternative. Medium and High Investment BRT options would operate faster using the more direct and separate Master Plan alignment than along Jones Bridge Road, and so using a Jones Bridge Road alignment for these options would not compare favorably to the using the Master Plan alignment. The traffic analysis indicated that providing dedicated lanes for transit along the entire length of Jones Bridge Road would not significantly improve travel times nor were they considered to be a justified investment, especially considering the potential impacts to adjacent properties. There was not a need to evaluate LRT options for Jones Bridge Road since costs associated with a LRT alternative would be higher than a BRT option.

Issue 9: Proposed alignment plans for the Bethesda to Silver Spring segment
The latest conceptual plans dated July 2007 for each of the build alternatives for the Bethesda to Silver Spring portion of the Purple Line are attached. These plans may be updated as part of the AA/DEIS.

Issue 10: Right-of-way widths
As communicated to the consultants previously, there are no differences in the right-of-way widths for the Master Plan alignment between the 1996 Georgetown Branch Transitway/Trail plans and the current plans for the Purple Line. As already noted, the 1996 plans were produced as half-size drawings. The attached drawings for all of the six build alternatives within the Bethesda to Silver Spring portion of the Purple Line also indicate the current "Limit of Disturbance" estimates.

Issue 11: Design standards for transitway and trail
The design standards for the hiker/biker trail were developed by Montgomery County Maryland-National Capital Park and Planning Commission (M-NCPPC) and provided to the MTA. Attached is the January 2001 Facility Plan for the Capital Crescent & Metropolitan Branch Trails that includes information regarding design concepts for the trail which would be built along side of the Purple Line transitway if the Georgetown Branch Master Plan alignment is selected as part of the Locally Preferred Alternative. The M-NCPPC has directed the MTA to plan for a 10 foot wide paved trail with 2 foot shoulders on each side wherever feasible.

For the Purple Line, attached is a draft of General Guidelines Tangent Track/Roadway that is being used as a basis for the current conceptual plans. As mentioned previously, these plans and guidelines are subject to further refinements as we complete the AA/DEIS.

Issue 12: Conceptual plans between Pearl Street and Connecticut Avenue
The attached conceptual plans indicate the structures, walls, etc. that would be built within the right-of-way south of the track alignment.

Issue 13: Trail crossing at Connecticut Avenue
The Low Investment BRT alternative using Jones Bridge Road would cross Connecticut Avenue at-grade. For this option, it is assumed that the permanent Capital Crescent Trail would not be built as part of the Purple Line project. For the Low Investment LRT alternative, which would use the Master Plan alignment, both the transitway and trail would cross Connecticut Avenue at-grade. In the case of the other alternatives, Medium and High Investment BRT and LRT, both the transitway and trail would cross over Connecticut Avenue on aerial structures. There would be two separate bridges, one for the transitway and one bridge for the permanent trail.

Issue 14: Vehicle dimensions
LRT vehicles would range approximately from 66 feet up to 94 feet in length, and from about 8 feet to 8.9 feet in width. BRT vehicles would range approximately from a standard 40 foot bus to a 60 foot articulated bus.

Issue 15: Bethesda terminus operations and design
The attached conceptual plans show the current route of the Medium and High Investment BRT alternatives. The BRT vehicles traveling westbound would leave the Master Plan alignment at Pearl Street, travel north on Pearl Street, turn left at MD 410 (East-West Highway) and continue on MD 410 across MD 355, turn left into the WMATA bus facility at the Bethesda Metrorail Station where westbound passengers would be discharged. The eastbound vehicles would then pick up passengers and would continue south on Woodmont Avenue to the Master Plan alignment where the vehicles would turn left to return eastbound on the Master Plan alignment. The LRT station layout is shown in the attached conceptual plans.

In addition, attached is a copy of Georgetown Branch Transitway Terminal Stations Study completed by the Washington Metropolitan Area Transit Authority (WMATA) in 2001. Also attached is a description of the current concept for operation of the tailtrack located west of the Bethesda terminal station. Any switching of trains to another track would occur east of Pearl Street, as currently envisioned.

Issue 16: Jones Bridge Road terminus at NNMC
As indicated in the attached plans, the Low Investment BRT alternative using Jones Bridge Road would include a station on the grounds of the National Institutes of Health (NIH) near the Medical Center/NIH Metrorail Station on the west side of MD 355. This alternative would not include a station at NNMC.

Issue 17: Storage and Maintenance Facilities

For the LRT alternatives, there would be a storage and maintenance facility at both the western end of the corridor in the Lyttonsville area of Montgomery County and at the eastern end along MD 410 (Veterans Parkway) in the New Carrollton area of Prince George's County. Each facility would have a capacity of approximately half (20) of the LRT fleet. Attached are the conceptual plans for these LRT facilities.

The specific location and number of the BRT maintenance facilities have not been determined at this point, but they may be housed at existing bus maintenance facilities near the Purple Line corridor.

Issue 18: Additional materials

1. Cost estimates are continuing to be evaluated and refined. These estimates will be available in a Technical Report that will be completed along with the AA/DEIS.
2. Acceleration/deceleration rates will be available in a Technical report as part of the AA/DEIS.
3. Stream treatments within the Georgetown Branch right-of-way are shown in the attached conceptual plans.
4. The type of fencing proposed between the transitway and trail would not be selected until the next phase of design if the Master Plan alignment is selected.
5. Maintenance schedules would not be developed at this phase of design.
6. Noise measurements and potential noise impacts will be available in a Technical Report as part of the completed AA/DEIS.
7. There are no Transit Signal Priority plans developed at this phase of design.

Please contact me at 410-767-3694 or at mmadden@mtamaryland.com should you have questions on the additional information you have requested.

Sincerely,

Michael D. Madden
Chief, Project Development
Office of Planning

Attachments

Exhibit 2

Letter from Eric Gilliland, Director, Washington Area Bicyclists Ass'n to Mary Bradford, Director of Parks, Maryland-National Capital Park & Planning Commission

June 4, 2008

WASHINGTON AREA BICYCLIST ASSOCIATION
1803 connecticut ave. nw – washington, dc 20009
p: 202-518-0524 f: 202-518-0936 www.waba.org

June 4, 2008

Mary Bradford
Director of Parks
Maryland National Capital Park and Planning Commission
9500 Brunett Avenue
Silver Spring, MD 20901

Dear Ms. Bradford:

On behalf of the Washington Area Bicyclist Association and the undersigned organizations, I am writing today to urge the Maryland-National Capital Park and Planning Commission (MNCPPC) to provide a period for public comment on the speed limits and other safety improvements that have recently been recommended for the Capital Crescent Trail. While we all share your concerns about safety along the trail, and many of us work actively on promoting responsible trail use, we are very dismayed that proposed changes were made without public input. By opening up a dialog with all trail user groups, including runners, roller bladers, walkers, and cyclists we strongly feel we can arrive at a solution to managing the heavily used trail that better balances the responsibility for trail safety among all who use the facility without unduly impacting the many cyclists who use the trail for commuting purposes in off peak hours.

The Capital Crescent Trail is one of the jewels of the Washington region. Every year, this trail sees over a million visitors making it one of the most heavily used trails in the country. When it was initially designed, it may have been adequate for the number of runners, walkers and cyclists that came to the trail, but as the popularity of trail increased dramatically, the challenge of managing trail safety has also increased. To maximize public safety while keeping the Capital Crescent Trail a valuable resource for all users, it is important to adopt safety measures that are tailored for a mixed-use trail environment. Simply importing rules designed for automobiles onto a mixed-use trail fails to recognize the many differences between a public road like Rockville Pike and a hiker-biker path like the Capital Crescent Trail. The shared nature of a mixed-use trail requires greater consideration to the needs and safety of all users. Our concerns, in addition to the lack of public involvement, are that a proper analysis of crash data for the trails which would help determine the nature of the problem was not conducted, nor was any thought given to the possibility of widening the trail to help segregate users.

We are concerned that MNCPPC's plans may actually have the unwanted effect of decreasing overall public safety. For instance, cycling at 15 mph on the Capital Crescent Trail sometimes is too fast, such as when riding through especially heavy trail congestion or when passing large groups of young children. Speed is not, in and of itself, a safety problem. Trail safety is dependent on educating all trail users on their responsibilities and how to properly act within the environment that is presented to them. By creating the appearance that it is always permissible to travel at 15 mph, M-NCPPC could, in fact, be creating the very problem they are hoping to address. The rule also does not take into account the fact that many cyclists do not use speedometers and would therefore not know their true speed, nor does it address safety concerns at at-grade crossings where encroaching construction and vegetation reduce sight distances for both trail users and motorists.

While the trail is certainly heavily used, there are peak times for the trail, as well as peak locations where trail traffic is usually heavy, such as just south of Bethesda, where a speed of 15 mph would be unsafe.

However, during commuting hours or when no other users are present, the speed limit serves no purpose and will not impact trail safety. The speed limits being imposed do not reflect the nature of the trail, nor does it address the diversity of users. In MNCPPC's press release on the improvement no mention was made of what efforts will be made to educate walkers, runners, or those with dogs on leashes. While we stand ready to assist MNCPPC with efforts to educate trail users on their responsibilities, no mention was made about what education efforts the county will undertake.

Many cyclists who use the Capital Crescent Trail see it as a safe and environmentally friendly way to commute between Bethesda and the District of Columbia or Northern Virginia. Especially in this time of rising gas prices, unhealthy air quality, and rising rates of obesity the County should be encouraging rather than discouraging alternative forms of transportation. While we all wish that the roads of the DC region were safe for all types of cyclists, the simple fact remains that most roads were designed with only motor vehicles in mind. As progress toward the implementation of the Montgomery County Functional Bikeways Master Plan remains stalled, and key new multiuse trails which would take pressure off the Capital Crescent Trail fall victim to budget realities, the Capital Crescent will continue to see a rise in the number of users. We hope that MNCPPC, through their involvement in the revisions to the County's Road Code, will be strong voice for better on road facilities for cyclists and continue to push new trail development which together will help take pressure off the Capital Crescent.

There is still time to find a solution that will be acceptable to all trail users and we stand ready to provide any knowledge and assistance you may need. M-NCPPC should respond to the controversy that has erupted over its new rules by opening a period of notice and comment on how to make the Capital Crescent Trail safer and more enjoyable for all. We are confident that by working together, a solution can be found that all types of trail users will be able to support.

Respectfully,

Eric Gilliland
Director
Washington Area Bicyclist Association

/s/
Andy Clark
Director
League of American Bicyclists

/s/
Jack Cochrane
Chair
Montgomery Bicycle Advocates

Exhibit 3

Statement of Samuel I. Schwartz, P.E.

January 13, 2009

STATEMENT OF SAM SCHWARTZ

1. My name is Sam Schwartz. I am the founder and CEO of Sam Schwartz Engineering ("SSE"), a 60-person multidisciplinary transportation planning and traffic engineering firm with offices in New York City, New York, and Newark, New Jersey, Chicago, Illinois and Arlington, Virginia.

2. I hold a Bachelor of Science degree in Physics from Brooklyn College and a M.S. in Civil Engineering from the University of Pennsylvania. I have spent over 37 years in the traffic engineering and transportation planning field. Among other positions, I served as New York City's Traffic Commissioner from 1982 to 1986, and as the New York City Department of Transportation's Chief Engineer/First Deputy Commissioner from 1986 to 1990. I was named 1988 Transportation Engineer of the Year by the Institute of Transportation Engineers for integrating successful traffic and transit programs. I was also named 2008 Engineer of Year from American Society of Civil Engineers, NY Chapter, and 2008 Engineer of the Year from American Council of Engineering Companies. NY State and Public Works magazine also named me a 2008 Trendsetter in the United States. I founded SSE in 1995.

3. SSE has served as consultants for the Town of Chevy Chase and as such, has extensively analyzed information concerning the Purple Line that the State of Maryland has made available to the public. Among other things, SSE has reviewed documents and information made available by the Maryland Department of Transportation and the Maryland Transit Administration ("MTA"), including MTA's Alternatives Analysis/Draft Environmental Impact Statement ("AA/DEIS"). I have been personally involved in this review and consultation process. I base the following statements on my own and my staff's review of these materials and my personal experience in the traffic engineering and transportation planning field.

4. SSE has studied MTA's proposal to use a double-track light rail train ("LRT") along the Georgetown Branch right-of-way between Bethesda and Silver Spring, Maryland. Nearly a mile of this right-of-way east of Woodmont Avenue is only 32 to 66 feet wide. On page 2-22 of the DEIS, MTA offers a "typical section" of a 66-foot wide right-of-way depicting a 10-foot wide trail. This is the only detailed depiction of the proposed treatment showing a double-track LRT and the Capital Crescent Trail ("CCT") in this section of right-of-way. The "typical section" is inconsistent or incompatible with the constraints inherent in those sections of the right-of-way that are only 66 feet wide, or even narrower. These schematics show a 10-foot wide hiker/biker trail with shoulders and buffers between the trail and LRT double-track. In these sections of the right-of-way, however, such arrangements are not possible. In fact, drawing BM-05 from the Conceptual Alignment Plans and Profiles technical report attached to the DEIS—which does not provide sufficient detail to measure proposed trail width—does not conform with the "typical section." The width of the CCT may be reduced below the Park and Planning Council's recommended 12 foot minimum, and in other instances the trail may be eliminated altogether.

5. A double-tracked LRT system would also entail greater construction, grading, and slope easement impacts on the right-of-way than the single-track trolley recommended in Montgomery County Georgetown Branch Master Plan Amendment (approved and adopted January 1990).

6. Construction of the LRT alternatives would significantly reduce the number of trees in and near the right-of-way. SSE estimates that up to fifteen acres of trees could be lost as a result of building the LRT alternatives. Adoption of any of the LRT alternatives would also require that the transitway remain permanently free of virtually all trees that could provide

canopy cover. This is because overhanging or falling branches pose a risk to the LRT catenary wires. In addition, falling leaves can cause safety hazards on LRT tracks, as wet leaves can interfere with the ability of LRT vehicles to effectively brake.

7. The LRT alternatives for the Purple Line call for at-grade crossings for CCT users in the Georgetown Branch right-of-way. Such crossings will require gates with warning bells and use of train horns at volumes sufficiently loud to warn pedestrians of trains approaching at speeds of 35 miles per hour.

8. MTA has failed to optimize the performance of the Low Investment Bus Rapid Transit alternative proposed in the AA/DEIS. Traffic signal priorities are used for bus rapid transit ("BRT") systems at busy intersections in a number of congested metropolitan areas. For example, BRT signal priorities are used at intersections on Wilshire Blvd. in Los Angeles, and Fordham Road in New York City, both notoriously congested urban arterials intersecting with other congested arterials. In one signal priority project on Victory Boulevard in Staten Island, New York, traffic signal priorities decreased bus running times by approximately 17% in the morning and 11% in the evening. These statistics come from a report documenting the Victory Boulevard project.

9. In its analysis of traffic signal priorities at the Connecticut Avenue and Rockville Pike intersections with Jones Bridge Road, MTA used a 105-second bus priority. In my experience, a 105-second priority is unheard of in industry practice, and was unreasonable to use, as it would result in unacceptable delays for the north- and south-bound traffic on Connecticut Avenue and Rockville Pike.

10. BRT priority lanes can be created with relatively small roadway widenings, or even within the existing roadway. BRT priority lanes on Fordham Road and on 34th Street in

New York City are examples of such moderate accommodations for bus priority lanes. MTA itself has proposed these moderate roadway widenings elsewhere in its Purple Line DEIS, such as for the design of Wayne Avenue in Silver Spring, which widens the roadway by only 15 feet (approximately 7.5 feet on either side).

11. In addition, BRT systems are frequently used in conjunction with "road diets." A road diet uses bus priority lanes within the existing roadway and takes away travel lanes from cars with the result of decreasing the number of crashes and allotting road space to other uses (MSHA, 2008). SSE proposed that MTA consider use of a road diet concept in conjunction with the Low Investment BRT, but no such analysis appears in the AA/DEIS.

12. Overall, SSE's analysis shows that, if these standard BRT treatments were used, Low Investment BRT travel time between Silver Spring and the Medical Center would be 12.5 minutes, as opposed to the 19.8 minutes that MTA calculates, and Low Investment BRT travel time between Silver Spring and downtown Bethesda would be 17 minutes, rather than the 25 minutes MTA calculates.

13. MTA overestimated ridership for the CCT alignments. Standard industry practice dictates 0.5 miles as the maximum waking radius around BRT and LRT stations for the purposes of estimating ridership. *Transit Capacity and Quality of Service Manual* (2004). Because areas of downtown Bethesda and North Woodmont are more than 0.5 miles from the proposed Bethesda terminus of the Purple Line LRT alternatives, it is not consistent with standard industry practice to assume that these alternatives would attract riders to the Purple Line. Prior to the release of the AA/DEIS, MTA incorrectly assumed that the CCT alternatives would attract riders from this area, and when SSE pointed this error out, MTA corrected the mistake in a document entitled "Assessment of 'Analysis of MTA Purple Line Alternatives and Alignments' and Other

Documents Prepared by Sam Schwartz Engineering." That correction, however, is not reflected in the AA/DEIS, which actually increased the projected ridership from earlier estimates. Thus, it appears that MTA's ridership projection still improperly includes ridership from outside the 0.5 mile walking radius from the terminus of the CCT alternatives in downtown Bethesda, in violation of accepted transportation planning practice.

14. MTA also overstated the degree to which the LRT alternatives will serve the job growth at the campus of the National Institutes of Health and the National Naval Medical Center, where the Walter Reed Army Hospital will be relocated. The LRT alternatives do not serve the medical center campus directly, and can do so only by means of a transfer to the Red Line in Bethesda. In transportation planning, standard transfer penalties are traditionally included in industry estimates of travel times used to determine ridership, including the time it takes to walk between vehicles at the transfer point and waiting times for connecting vehicles. These transfer penalties reflect a person's perception of the time and effort inherent in the transfer and more accurately predict the number of people willing to complete a trip that includes a transfer. The *Transit Capacity and Quality of Service Manual* (2004) provides industry-standard transfer penalties. The negative impact of such required transfers is cited (Headlights, the magazine of electric railways, Jan-June, 2005, page 3) as one reason why Los Angeles' Gold Line LRT was carrying only 50% of the riders projected in the pre-construction estimates. Despite this, the MTA DEIS concludes that the alternatives using the Capital Crescent Trail, requiring such a transfer, will serve the Medical Center area as well, and carrying as many people, as the Jones Bridge Road alternative, which provides direct, transfer-free service.

Samuel I. Schwartz, P.E.
New York, New York January 13, 2009

Exhibit 4

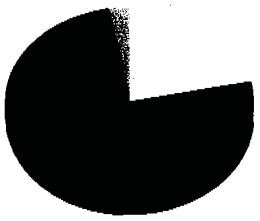
American Forests, Analysis Report

AMERICAN FORESTS
americanforests.org

Analysis Report

CITYgreen

Interim Capital Crescent Trail



Impervious Surfaces	11.8%
Open Space - Grass/Scattered Trees	9.9%
Trees	75.4%
Urban: Barc	2.8%
Total:	100.0%

Interim Capital Crescent Trail Proposed Rail Line

Impervious Surfaces	100.0%
Total:	100.0%

Air Quality Results

Pounds Removed per Year

Pollutant	2001	Rail Line
Carbon Monoxide:	74	0
Nitrogen Dioxide:	298	0
Ozone:	581	0
Particulate Matter:	491	0
Sulfer Dioxide:	238	0
Total:	**1,683**	**0**

By absorbing and filtering out nitrogen dioxide (NO2), sulfur dioxide (SO2), ozone (O3), carbon monoxide (CO), and particulate matter less than 10 microns (PM10) in their leaves, urban trees perform a vital air cleaning service that directly affects the well-being of urban dwellers. This model, UFORE, developed the the US Forest Service, estimates the annual air pollution removal rate of trees within a defined study area for the pollutants listed below. To calculate the dollar value of these pollutants, economists use "externality" costs, or indirect costs borne by society such as rising health care expenditures and reduced tourism revenue. The actual externality costs used in the model is set by the each state, Public Services Commission.

Benefits Summary

Landcover Change (acres)			
Landcover	**Current Use**	**Rail Line**	
Tree Canopy:	17		
(The Interim Capital Crescent Trail totals 22 acres)			
Air Pollution Benefits			**Change**
Pollutants Removed (lbs):	1,683	0	-1,683
$ Amount:	$3,918	$0	-$3,918
Carbon Stored (tons):	719	0	-719
Carbon Sequestered (lbs):	6	0	-6

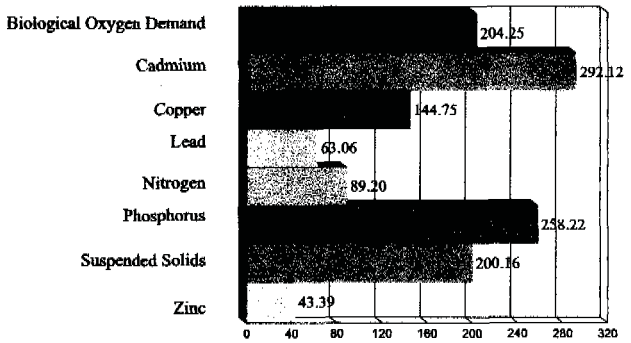
Stormwater Results

Stormwater Volume Change Summary

2-yr, 24-hr Rainfall:	3.25 in.
**Curve Number reflecting conditions in 2001 (current use):*	70
**Curve Number reflecting conditions if area is used for rail line:*	98
Increase in stormwater runoff due to rail line use:	173,607 cu. ft.
Construction cost, per cu. ft.of stormwater, to build retention facility :	$2.00
Added cost of stormwater retention resulting from use for rail line:	**$347,215**

Water Quality (Contaminant Loading)

Percent Change in Contaminant Loadings from 2001 (current use) to use for rail line



Notes: *The stormwater calculations are based on curve number which is an index developed by the NRCS, to represent the potential for storm water runoff within a drainage area. Curve numbers range from 30 to 100. The higher the curve number the more runoff will occur. The change in curve number reflects the increase in the volume of stormwater runoff.

The landcover data used was classified from Ikonos satellite imagery collected during the summer of 2001. The Interim Capital Crescent Trail (Georgetown Branch Trail) from Silver Spring to Bethesda, Maryland was digitized using Montgomery County, Maryland orthoimagery collected in August 2006. The trail was buffered to a 33 foot extent on both sides.

Exhibit 5

Statement of David Salzman

November 18, 2008

David Salzman, Ph.D.
4407 Elm Street, Chevy Chase, MD 20815
301-654-5588

November 18, 2008

I am a physicist and entrepreneur who builds businesses in Montgomery County. I thank the MTA for this opportunity to address the energy and pollution implications of various proposed Purple Line alignments and modes.

It's downright flabbergasting that a so-called Environmental Impact Statement would fail to assess and compare properly the pollution implications of the LRT and BRT options, but the document astonishes in too many ways to count.

The Maryland Transit Administration has itself admitted, "Sources of power for both [bus and rail] are improving, which will result in a clean transportation alternative... regardless of the mode chosen."

In other words, bumper stickers notwithstanding, there is no scenario that makes the LRT cleaner or greener than the BRT if both use the best available technology. I can tell you as a technologist who looks into the future that the LRT will not be cleaner or greener than the BRT as far as we can see.

But analysis shows that in fact, reliance on electricity for power will actually make the LRT dirtier and browner than the BRT! Studies show that the LRT— yes, the rail option — emits

- four times as much carbon dioxide per mile,
- and vastly more mercury,
- sulfur dioxide, and
- particulates:

nasty stuff the LRT mode would subject us to and the BRT would avoid.

It turns out that the slogan "Purple Line, Greener Future" is misleading: unsupported by evidence and contradicted by the facts.

I appreciate that this is counter-intuitive. It surprised me too, but as a physicist I have to respect the hard data. I would hope that you too will likewise respect facts over mere prejudices when you get new data. The Departments of Energy and Transportation have looked hard at this, and the US National Academies have published a definitive report. Their datasets agree: **The BRT option is both cleaner and greener than the LRT.**

To be specific, I have analyzed and compared the proposed routes myself for (1) total pollution and (2) greenhouse gas emissions. These are my findings:

- Regarding the six proposed alignments: No one alignment produces significantly less or more emission than the other five. However, the Jones Bridge Road alignment avoids clear-cutting across the entire 66-foot wide right-of-way for the 5 1/2 acres of parkland coming into Bethesda, so in that sense is greener.

- Regarding the LRT versus BRT modes: Differences between the proposed vehicles matter moderately, assuming modern vehicles.
  - Electrified streetcars and light rail trains pollute approximately equally per mile.
  - Modern LRT pollutes much more than BRT per mile: for instance, four times more greenhouse CO_2 and even worse ratios of mercury, sulfur dioxide, and particulates. People do not generally know this. So why are electrified vehicles popular? Electricity in Maryland is mostly generated from coal, which may be dirty, but is very cheap and, except for global effects, burned in somebody else's backyard!
  - The BRT and LRT options are both less polluting than cars per passenger mile if their passenger load factors are high, their weights are low, and stations are far apart.
  - No alternative energy technology emerging on the horizon is going to rescue us from these unhappy facts: The BRT option is decisively cleaner and greener. Sorry!

Nor will the Purple Line reduce traffic. It appears that by triggering provisions in the Master Plan allowing higher density development, **perversely, the Purple Line will *increase* congestion: more cars on the road, slower traffic, longer commute times, and more pollution from cars**. It is clear that turning Chevy Chase Lake into another Friendship Heights would do the opposite of getting cars off the road, and would overwhelm any effect the Purple Line night have in getting East-West commuters out of their cars. How exactly is making the North-South traffic worse "smart growth"?

The attached figure explains why **electricity is a huge NIMBY issue: It appears clean at the point of use, but is far dirtier than the fossil fuel it displaces**.

I have also provided summaries of a few key studies as reference material.

Thank you for your patience and attention to these issues.

Why is LRT browner and dirtier than BRT?

LRT is as cheap and dirty as coal, and inefficient because of transmission.

1. **Generate torque** by obtaining and burning **coal fuel** at a power plant to heat water in a boiler. Also emit pollutants (mercury, sulfur dioxide, particulates, NOx) and CO_2.
2. **Compensate** for losses through step 6 by also burning 150% more coal. ***Only 40% of the energy from step 1 makes it to step 6!!***
3. **Generate electricity** by applying the torque to turn a dynamo.
4. **Transmit** the electrical power by converting it to high voltage AC in switchyard and injecting it into the distribution grid.
5. **Retransmit** the electrical power through a substation by rectifying it into 750 volt DC and feeding it to overhead catenary wires.
6. **Generate torque** by receiving the electrical power onboard the streetcar or train car and running an electric motor.
7. **Turn wheels** by applying the torque through a transmission.
8. **Dissipate energy** to acceleration, rolling friction, air motion, elevation changes, etc.

BRT is efficient, but as expensive and clean as its fuel.

1. **Generate torque** by obtaining and burning **natural gas or diesel fuel** in an internal combustion engine to generate torque. Also emit pollutants (NOx, VOC) and CO_2.

2 – 6 (Steps are not used, so are effectively 100% efficient)

7. **Turn wheels** by applying the torque through a transmission.
8. **Dissipate energy** to acceleration, rolling friction, air motion, elevation changes, etc.

Ignoring the massively higher capital costs, operating an LRT and BRT cost about the same, but the LRT is much more polluting. That's because coal is filthy but cheap: equivalent to gasoline at 62¢ per gallon, which is still $1.55 per gallon after inefficiencies!

Some Worthwhile Papers:

The DOE's National Renewable Energy Lab (NREL) maintains an Energy Data Book with the best current and projected data on technical capabilities.
http://www.nrel.gov/analysis/power_databook/docs/pdf/39728_complete.pdf

Messa wrote the definitive paper from the National Academies.[1]
Abstract: "The study found that emissions attributable to electric rail modes are highly variable and depend on the cleanliness of the electricity generated. The dirtiest electricity pollutes orders of magnitude more than the cleanest. The study conclusion is that emissions from diesel multiple units (DMU) [a diesel train] and electric rail modes are not dramatically different on a per seat mile basis and that the exact comparison will depend on the cleanliness of the electricity generation and the type of diesel multiple unit consist. When compared on a per seat mile basis against electric rail modes using the average electricity generated in the United States, DMUs emit about the same amount of PM, equal or greater amounts of NOx, more CO and VOCs, and less CO_2. The study also concludes that the rapidly changing diesel engine emissions standards will result in DMUs being introduced within the next 6 years [from 2005] with PM and NOx emissions that are nearly as low as the cleanest electricity generation today."

MALTESE (Management and Assessment of Light Trains for Energy Savings and Efficiency)[2] is a European research project aiming at the assessment of the energy efficiency of Light Rail Transit systems (LRT) and the investigation of the factors likely to increase the efficiency of such systems.
MALTESE developed the Energy Balance Archetypal model (EBA Model) to calculate the energy consumption of LRT systems. The model comprises all aspects related to the energy consumption of a tramway or metro line, its vehicles, operation and infrastructure (line, stations) and their interaction with external factors (e.g. demand, climate).
I have obtained and worked through the MALTESE's EBA model: **Vehicle weight, passenger load, and the number of stations outweight every other consideration**.

Vincent & Walsh[3] wrote a systems analysis of emissions and greenhouse gases from BRT, LRT, and heavy rail–metro-type systems, including power plant emissions and line losses. They established that **modern BRT systems outperform modern electric rail systems in the areas of particulate matter (PM), nitrous oxides (NOx), mercury (Hg), and carbon dioxide (CO_2) emissions per passenger mile**.

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[1] Messa, "Comparison of Emissions from Light Rail Transit, Electric Commuter Rail, and Diesel Multiple Units," *Transportation Research Record: Journal of the Transportation Research Board.* Transportation Research Board of the National Academies. ISSN 0361-1981, pp 26-33, February 28, 2007. http://trb.metapress.com/content/24t5707k6pt40741/fulltext.pdf

[2] I have the model and am happy to share it privately, but am not permitted to redistribute the software itself. The project is described at http://www.ivv-aachen.de/maltese/english/start.htm

[3] Vincent and Walsh. *The Electric Rail Dilemma: Clean Transportation from Dirty Electricity?* Breakthrough Technologies Institute, 2003. http://gobrt.org/RailBRTAirQualityAnalysis.pdf

The PurpleLineNow's own web site points to the paper by Christopher Puchalsky[4], so presumably endorses such junk. He claims to compare pollutants but unilaterally refuses to consider CO_2, particulates, sulfur dioxide and mercury! This is a preposterous methodology, arbitrarily throwing out all the greenhouse gases and poisons that happen to make LRT dirty. His corrections to NOx emissions and VOCs may or may not be valid but are not significant. Puchalsky also criticizes Vincent & Walsh for assuming that electricity derives from relatively dirty sources, though in Maryland it overwhelmingly does. Puchalsky also criticizes Vincent & Walsh for ignoring emission from refining, transporting, storing, and delivering the fossil fuel, which is known to be a trivial correction (10 to 20%) compared to generation & transmission losses of 250%. Finally, Puchalsky accuses Vincent & Walsh of citing poor examples of electric rail technology, but an apples-to-apples comparison of modern LRT and BRT vehicles by others supports them, not him. Puchalsky tries to make the case that LRT is dirtier than BRT, but ends up just embarrassing himself.

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[4] Puchalsky, "Comparison of Emissions from Light Rail Transit and Bus Rapid Transit," *Transportation Research Record: Journal of the Transportation Research Board*, No. 1927, Transportation Research Board of the National Academies, Washington, DC, 2005, pp. 31–37.
http://www.innerpurpleline.org/LRT%20vs%20BRT%20emmissions.pdf

	A	B	C	D
1	© 2008 David Salzman, PhD, 4407 Elm Street, Chevy Chase MD 20815			
2	***Comparison of LRT and BRT energy efficiency and CO2 intensity***			
3	**Constants:**			
4		MJ/Mbtu	1,055	
5		MJ/gal	140	**gal** refers to volume of diesel w equivalent energy
6		Mbtu/gal	0.133	=C5/C4
7		MJ/kWh	3.6	
8		btu/cf	1,031	**cf** refers to cubic foot of natural gas at STP
10	**Coal at power plant:**			
11		$/ton	$118.00	www.eia.doe.gov/cneaf/coal/quarterly/qcr_sum.html
12		$/lb	$0.0590	=C11/2000
13		$/Mbtu	$4.70	www.eia.doe.gov/cneaf/electricity/epm/table4_10_a.html
14		Mbtu/lb	0.012553	=C12/C13
15		MJ/lb	13.24	=C14*C4
16		MJ/$	224.47	=C15/C12
17		lbs/gal	10.57	=C6/C14
18		$/gal	$0.62	=C13*C6
19		CO2 lbs/Mbtu	210.2	www.eia.doe.gov/cneaf/coal/quarterly/co2_article/co2.html
20		CO2 lbs : coal lb	2.64	=C19*C14
22	**Electricity rcvd at train**			
23		Elec Xmit Effic	40%	Surviving power, assuming major future technology improvements (actually 32% today)
24		$/Mbtu	$11.75	=C13/C23
25		$/gal	$1.56	=C18/C23
26		lbs/gal	26.43	=C17/C23
27		CO2 lbs : coal lb	6.60	=C20/C23
29	**LRT nominal:**			**(Before correcting for power lost getting to the train)**
30		btu/EIApas-mile	2,784	cta.ornl.gov/data/tedb27/Edition27_Chapter02.pdf
31		EIA pas load factor	22.5	cta.ornl.gov/data/tedb27/Edition27_Chapter02.pdf
32		Quality versus avg	200%	**Arbitrary figure, biased to advantage the train**
33		btu/mile	31,320	=C30*C31/C32
34		local mpg equiv	**4.24**	=1000000*C6/C33
36	**LRT actual:**			
37		coal lbs/mile	6.24	=C33/(1000000*C14*C23)
38		**actual equiv mpg**	**1.69**	=C34*C23
39		**CO2 lbs/mile**	**16.46**	=C20*C37
41	**Natural gas at bus:**			
42		CO2 lbs/cf	0.122	http://cdiac.ornl.gov/pns/faq.html
43		CO2 lbs/Mbtu	118.3	=1000000*C42/C8
45	**BRT:**			
46		btu/EIApas-mile	4,235	cta.ornl.gov/data/tedb27/Edition27_Chapter02.pdf
47		EIA pas load factor	8.8	cta.ornl.gov/data/tedb27/Edition27_Chapter02.pdf
48		Quality versus avg	100%	**Arbitrary figure, biased to advantage the train**
49		btu/mile	37,268	=C46*C47/C48
50		**actual equiv mpg**	**3.56**	=1000000*C6/C49
51		**CO2 lbs/mile**	**4.41**	=C43*C49/1000000
53		**BRT:LRT CO2/mile**	**27%**	=C51/C39
54		**local BRT:LRT mpg**	**0.84**	=C50/C34
55		**actual BRT:LRT mpg**	**2.10**	=C50/C38

Great care should be taken when comparing modal energy intensity data among modes. Because of the inherent differences among the transportation modes in the nature of services, routes available, and many additional factors, it is not possible to obtain truly comparable national energy intensities among modes. These values are averages, and there is a great deal of variability even within a mode.

Table 2.12
Passenger Travel and Energy Use, 2006

	Number of vehicles (thousands)	Vehicle-miles (millions)	Passenger-miles (millions)	Load factor (persons/ vehicle)	Energy intensities (Btu per vehicle-mile)	Energy intensities (Btu per passenger-mile)	Energy use (trillion Btu)
Cars	**135,399.9**	**1,682,671**	**2,641,793**	**1.57**	**5,514**	**3,512**	**9,277.7**
Personal trucks [a]	**87,223.1**	**910,229**	**1,565,595**	**1.72**	**6,785**	**3,944**	**6,175.5**
Motorcycles	**6,686.1**	**12,401**	**14,881**	**1.2**	**2,226**	**1,855**	**27.6**
Demand response[b]	**42.0**	**978**	**930**	**1.0**	**13,595**	**14,301**	**13.3**
Vanpool	**6.6**	**99**	**605**	**6.1**	**8,048**	**1,322**	**0.8**
Buses	[c]	[c]	[c]	[c]	[c]	[c]	**196.0**
Transit	83.0	2,498	21,998	8.8	37,310	4,235	93.2
Intercity[d]	[c]	[c]	[c]	[c]	[c]	[c]	29.8
School[d]	669.2	[c]	[c]	[c]	[c]	[c]	73.0
Air	[c]	[c]	[c]	[c]	[c]	[c]	**2,139.9**
Certificated route[e]	[c]	6,003	577,620	**96.2**	**313,776**	3,261	1,883.6
General aviation	221.9	[c]	[c]	[c]	[c]	[c]	256.3
Recreational boats	**13,080.0**	[c]	[c]	[c]	[c]	[c]	**247.7**
Rail	**19.5**	**1,282**	**31,000**	**24.2**	**68,097**	**2,816**	**87.3**
Intercity (Amtrak)	0.3	264	5,410	20.5	54,167	2,650	14.3
Transit (light & heavy)	12.8	715	16,117	22.5	62,797	2,784	44.9
Commuter	6.4	303	9,473	31.3	92,739	2,996	28.1

Source:
See Appendix A for Passenger Travel and Energy Use.

[a] Changed significantly due to newly available data from the 2002 Vehicle Inventory and Use Survey. See Appendix A for details.

[b] Includes passenger cars, vans, and small buses operating in response to calls from passengers to the transit operator who dispatches the vehicles.

[c] Data are not available.

[d] Energy use is estimated.

[e] Only domestic service and domestic energy use are shown on this table. (Previous editions included half of international energy.) These energy intensities may be inflated because all energy use is attributed to passengers–cargo energy use is not taken into account.

Great care should be taken when comparing modal energy intensity data among modes. Because of the inherent differences among the transportation modes in the nature of services, routes available, and many additional factors, it is not possible to obtain truly comparable national energy intensities among modes. These values are averages, and there is a great deal of variability even within a mode.

Table 2.13
Energy Intensities of Highway Passenger Modes, 1970–2006

	Cars		Light truck[a]	Buses	
				Transit[b]	
Year	(Btu per vehicle-mile)	(Btu per passenger-mile)	(Btu per vehicle-mile)	(Btu per vehicle-mile)	(Btu per passenger-mile)
1970	9,250	4,868	12,479	31,796	2,472
1975	8,993	4,733	11,879	33,748	2,814
1976	9,113	4,796	11,523	34,598	2,896
1977	8,950	4,710	11,160	35,120	2,889
1978	8,839	4,693	10,807	36,603	2,883
1979	8,647	4,632	10,467	36,597	2,795
1980	7,916	4,279	10,224	36,553	2,813
1981	7,670	4,184	9,997	37,745	3,027
1982	7,465	4,109	9,268	38,766	3,237
1983	7,365	4,092	9,124	37,962	3,177
1984	7,202	4,066	8,931	38,705	3,307
1985	7,164	4,110	8,730	38,876	3,423
1986	7,194	4,197	8,560	37,889	3,545
1987	6,959	4,128	8,359	36,247	3,594
1988	6,683	4,033	8,119	36,673	3,706
1989	6,589	4,046	7,746	36,754	3,732
1990	6,169	3,856	7,746	37,374	3,794
1991	5,912	3,695	7,351	37,732	3,877
1992	5,956	3,723	7,239	40,243	4,310
1993	6,087	3,804	7,182	39,043	4,262
1994	6,024	3,765	7,212	37,313	4,268
1995	5,902	3,689	7,208	37,277	4,310
1996	5,874	3,683	7,247	37,450	4,340
1997	5,797	3,646	7,251	38,832	4,431
1998	5,767	3,638	7,260	41,182	4,387
1999	5,821	3,684	7,327	40,460	4,332
2000	5,687	3,611	7,158	41,548	4,515
2001	5,626	3,583	7,080	38,341	4,125
2002	5,662	3,607	7,124	37,301	4,106
2003	5,535	3,525	7,673	36,628	4,160
2004	5,489	3,496	7,653	37,498	4,323
2005	5,607	3,571	7,009	37,298	4,235
2006	5,514	3,512	6,904	37,298	4,235
	Average annual percentage change				
1970–2006	-1.4%	-0.9%	-1.6%	0.4%	1.5%
1996–2006	-0.6%	-0.5%	-0.5%	0.0%	-0.2%

Source:
See Appendix A for Highway Passenger Mode Energy Intensities.

[a] All two-axle, four-tire trucks.

[b] Series not continuous between 1983 and 1984 because of a change in data source by the American Public Transit Association (APTA).

[c] Data are not available.

Great care should be taken when comparing modal energy intensity data among modes. Because of the inherent differences between the transportation modes in the nature of services, routes available, and many additional factors, it is not possible to obtain truly comparable national energy intensities among modes.

Table 2.14
Energy Intensities of Nonhighway Passenger Modes, 1970–2006

	Air	Rail		
Year	Certificated air carriers[a] (Btu per passenger-mile)	Intercity Amtrak (Btu per passenger-mile)	Rail transit (Btu per passenger-mile)	Commuter rail (Btu per passenger-mile
1970	10,282	[b]	2,157	[b]
1975	7,826	3,548	2,625	[b]
1976	7,511	3,278	2,633	[b]
1977	6,990	3,443	2,364	[b]
1978	6,144	3,554	2,144	[b]
1979	5,607	3,351	2,290	[b]
1980	5,561	3,065	2,312	[b]
1981	5,774	2,883	2,592	[b]
1982	5,412	3,052	2,699	[b]
1983	5,133	2,875	2,820	[b]
1984	5,298	2,923	3,037	2,804
1985	5,053	2,703	2,809	2,826
1986	5,011	2,481	3,042	2,926
1987	4,827	2,450	3,039	2,801
1988	4,861	2,379	3,072	2,872
1989	4,844	2,614	2,909	2,864
1990	4,875	2,505	3,024	2,822
1991	4,662	2,417	3,254	2,770
1992	4,516	2,534	3,155	2,629
1993	4,490	2,565	3,373	2,976
1994	4,397	2,282	3,338	2,682
1995	4,349	2,501	3,340	2,632
1996	4,172	2,690	3,016	2,582
1997	4,166	2,811	2,854	2,724
1998	4,146	2,788	2,822	2,646
1999	4,061	2,943	2,786	2,714
2000	3,952	3,253	2,729	2,551
2001	3,968	3,257	2,737	2,515
2002	3,703	3,212	2,872	2,514
2003	3,587	2,800	2,837	2,545
2004	3,339	2,760	2,750	2,569
2005	3,264	2,709	2,784	2,743
2006	3,228	2,650	2,784	2,743
		Average annual percentage change		
1970–2006	-3.2%	-0.8%	0.7%	[b]
1996–2006	-2.5%	-0.1%	-0.8%	0.6%

Source:
See Appendix A for Nonhighway Passenger Mode Energy Intensities.

[a] These data differ from the data on Table 2.12 because they do not include any international services. These energy intensities may be inflated because all energy use is attributed to passengers–cargo energy use is not taken into account.

[b] Data are not available.

Exhibit 6

Letter from Michael D. Madden, Chief, Project Development, Office of Planning, MTA, to Hon. Kathy Strom

October 24, 2008

MTA Maryland

MARYLAND TRANSIT ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION
Martin O'Malley, Governor • Anthony G. Brown, Lt. Governor
John D. Porcari, Secretary • Paul J. Wiedefeld, Administrator

October 24, 2008

The Honorable Kathy Strom
Mayor, Town of Chevy Chase
4301 Willow Lane
Chevy Chase, MD 20815

Dear Mayor Strom:

This letter has been written as the second response to your request (dated September 15th) for additional project information to be reviewed by you and your consultant with regards to the ongoing planning for the Purple Line AA/DEIS.

This letter responds to the remaining items on the list you provided earlier. In an effort to maintain clarity between the questions you asked and the responses provided we have retained the original text of your request (noted in italics below) and have provided our response immediately following each item. Much of the information requested is contained in the AA/DEIS and associated technical reports which have been referenced where appropriate.

As this response represents the final deliverable for the list of needs identified by your consultant we would like to request the scheduling of the meeting to discuss any additional technical questions or input required. We understand that there may be more questions generated by review of DEIS documents which can also be discussed at this meeting. Please let us know what dates and times work for you consultant for this meeting, we will work to insure that team members responsible for various parts of the project are available for that meeting.

The items requested:

1. ***Inputs used for the Transit Signal Priority (TSP analysis:***
    - ***How many seconds were the buses permitted to borrow from the other signal phases?***
    - ***Was borrowed time returned to the other signal phases in the following traffic cycle to prevent queuing?***
    - ***What was the assumed bus headway?***
    - ***How many passengers per bus were assumed in order to arrive at "Reduced person Hours of Delay"?***
    - ***Was an increase in BRT ridership due to travel time savings factored into the analysis of "Reduced person Hours of Delay?***

- ***BRAC-generated traffic is expected to impact these intersections. Are there signal timing changes associated with BRAC? What are they and how will they affect both northbound and southbound delays?***

MTA Response: Additional information on the methodology employed by the MTA on this analysis has been included for clarity. The MTA conducted a detailed evaluation of an early green / red truncation TSP strategy for BRT vehicles along Jones Bridge Road to determine the potential travel time savings for the BRT and the potential impacts to general vehicular traffic at the key intersections along Jones Bridge Road. Rather than evaluate every possible implementation of early green / red truncation, MTA's detailed analysis focused on a strategy which would provide the fastest overall travel times for BRT vehicles along Jones Bridge Road; this also allowed MTA to evaluate SSE's assertion that average travel speeds in excess of 14 mph could easily be attained along Jones Bridge Road.

MTA's evaluation indicated that approximately 2.1 minutes of delay could be reduced along Jones Bridge Road if a highly aggressive early-green / red truncation TSP strategy was implemented at the intersections of Jones Bridge Road with MD 355 (Rockville Pike) and MD 185 (Connecticut Avenue). Based on this travel time reduction of 2.1 minutes, MTA estimates an average speed along Jones Bridge Road of 14.8 mph could be attained. This average speed is in line with the average speed (14.4 mph) which SSE asserts MTA should have assumed for the Jones Bridge Road section of the Low BRT alternative. So, while the TSP strategy evaluated is only one such possible strategy, it provides travel times consistent with those proposed by SSE.

This TSP strategy resulted in substantial travel time savings for the BRT vehicles at the key intersections, but also substantial increases in delay for the high volume movements along MD 185 and MD 355. When compared on a basis of total person-delay, the negative impacts to the cross-street traffic exceeded the potential benefits for the BRT riders. Based on the substantial negative impacts to the cross-street traffic, MTA does not feel it is appropriate to assume such an aggressive TSP strategy, which would be required to attain the travel times suggested by SSE, at this planning level of analysis. During preliminary engineering and future project phases, MTA will continue to evaluate and pursue priority signal treatments for BRT or LRT vehicles (depending on the selected mode) wherever possible.

It must be noted that as these are state highways, any change to the signals at MD 185 and MD 355 would need to be acceptable to the State Highway Administration (SHA).

In order to achieve the level of travel time savings which would provide travel speeds consistent with SSE's estimates:

1. Buses were allowed to borrow up to 105 seconds from other signal phases at MD 355 and up to 67 seconds from other signal phases at MD 185. In each case, minimum green times were maintained for non-priority phases to ensure safe pedestrian crossings. In the Los Angeles system, which SSE frequently uses as a point of comparison, buses are only allowed to borrow up to 10 seconds from other phases (and only if the headway between it and the previous bus exceeds the scheduled headway by more than 50%). However, in order to achieve the speeds for the BRT suggested by SSE, significantly higher levels of green time needed to be made available for the BRT vehicles traveling along Jones Bridge Road.

2. Signal priority calls could not be made in two consecutive cycles.

3. Assumed bus headways were 6 minutes in each direction. 10 buses per hour per direction.

4. 60 passengers per bus (articulated bus seating capacity) were assumed for the reduced hours of person delay. If a seated + standing capacity (90 to 100 persons per bus) was assumed, the increase in person delay on the cross-streets still significantly exceeds the reduction in person-delay for the BRT passengers.

5. The same level of riders (60 per bus) was assumed for both the "without TSP" and "with TSP" cases. Assuming increased ridership under the "with signal priority" case would have actually reduced the amount of total person-delay savings at the intersection. For example, assume an average delay of 120 seconds per bus, with 60 passengers per bus, and 10 buses per hour. Total person-delay is 20 hours. Now assume an average delay of 60 seconds per bus, 60 passengers per bus, and 10 buses per hour. Total person delay is 10 hours; a reduction of 10 hours. Now assume average delay of 60 seconds per bus, 90 passengers per bus (50% ridership increase), and 10 buses per hour. Total person delay is now 15 hours (since there are more riders), and the reduction is only 5 hours of person-delay. Therefore, MTA elected to maintain the ridership levels for an apples-to-apples comparison.

6. MTA is coordinating with SHA regarding its current evaluation of improvements at the intersections of Jones Bridge Road with MD 185 and MD 355 to help accommodate the influx of additional traffic to the Jones Bridge Road corridor due to BRAC. To date, SHA has begun the design of its conceptual improvements, but has not held workshops on the proposed improvements or selected a final design. As such, this evaluation assumes no changes to the existing intersection configuration due to BRAC. It should be noted that the improvements at these intersections could reasonably be expected to lower the delay for various movements and may make the implementation of some limited form of early-green / red truncation signal priority treatments at these intersections a more realistic option.

2. ***Please provide copies of MTA videos and artist renderings shown at the meeting at the Town of Chevy Chase on August 26, 2008, along with a written description of the exact location and characteristics they are intended to show, for the Jones Bridge Road (JBR) and CCT alternatives.***

   MTA Response: Artist renderings of the corridor were provided in the disk provided previously. Dynamic renderings (videos) are not provided as they are in a continuing state of development.

3. ***What travel cost (fare) assumptions were used as inputs into the ridership model? If transfers were assumed to be free, please provide justification/documentation and indicate where this revenue reduction was quantified in the report.***

   MTA Response: The Metropolitan Washington Council of Government regional travel forecasting model used for the corridor forecasts includes the fare structures for the regional transit systems. The fare structure for the No-Build, TSM and all Build Alternatives under consideration would be consistent with the current local bus fare structure, recognizing that this would increase over time. SmartCard, or some other means of electronic fare collection, would enable an integrated fare structure and convenient transfer with the other transit services in the corridor.

4. ***Were queue jumps studied at any intersection besides Connecticut Avenue and Rockville Pike? What was MTA's methodology for deciding which intersections to study?***

   MTA Response: All locations with queue jumps are detailed in the AA/DEIS. The consideration of various BRT priority treatments was dependent on the assumed type of running way (shared, dedicated, exclusive), the traffic conditions, the potential property impacts, and potential costs. At each signalized intersection, potential treatments were considered which fit within the general parameters of the alternative being evaluated (i.e. Low Investment BRT included low cost measures).

5. ***Will the new Medium-Investment BRT alternatives be included in the Alternatives Analysis/DEIS being released in September? Were they submitted to the Federal Transit Administration (FTA)?***

   MTA Response: These concepts have been included in the AA/DEIS released in October as variations of the Medium Investment BRT Alternative. Information is provided in Chapters 2 (Alternatives), 3 (Transportation Impacts), 4 (Environmental Impacts), 5 (Costs), and 6 (Evaluation). This information was reviewed by FTA and deemed an appropriate response to and documentation of suggested concept

6. ***Capital costs for the new SSE Medium-Investment JBR BRT are higher than for the new (MTA) Medium-Investment CCT BRT to Medical Center in the MTA white paper. Since the new Medium-Investment CCT BRT to Medical Center still***

includes the cost of building the trail and an entirely new right-of-way, please document how the Jones Bridge Road alignment could cost more. Was the cost of the new Medical Center Metro entrance included in this cost after stating in the white paper that it would not be? What is the full capital cost of the CCT BRT between Jones Mill Road and Woodmont Avenue?

MTA Response: The cost of the Medical Center Metro entrance was included in the cost calculations in the summary table, as described. Capital cost information for the AA/DEIS alternatives can be found in the Capital Cost Estimating Methodology Technical Report. The capital cost estimate for the segment of the Master Plan Medium BRT alignment referred to above is $80.26 million dollars.

7. ***In addition to the capital cost calculations requested in the previous section, please also include these calculations for the two new Medium-Investment BRT alternatives.***

   MTA Response: Capital costs for the Jones Bridge Road alignment (with no connection to the Red Line Metro at Medical Center) are estimated at $37.1 million dollars. A $60 million dollar cost estimate was included to construct an underground connection to the Red Line, including access from both the NIH and NNMC sides of Rockville Pike.

8. ***What ridership estimates, by station, were used to evaluate the cost-effectiveness of the two new Medium-Investment BRT alternatives?***

   MTA Response: Cost effectiveness calculations are not based on station-level ridership forecasts. Instead, the transportation system user benefits forecasts in units of time (minutes, hours) are used along with capital and operating & maintenance cost estimates. This information is provided in the White Paper (Medium Investment BRT Variations Serving Medical Center) and in Table 6-4 of the AA/DEIS.

9. ***MTA states that penalties were assigned to the Low-Investment BRT alternatives on Jones Bridge Road for time waiting at traffic lights. What exactly were these penalties? Were these penalties also assigned to the new Medium-Investment JBR BRT? Please provide a citation for the use of these penalties in accepted transportation planning practice.***

   MTA Response: Please cite a report and page number specifically so that we may better address your question. A discussion of calculated travel speeds associated with intersection delays is included in the response to question 1.

10. ***Please identify all mode-specific constants used for the Purple Line FTA submission – which alternatives they were applied to, how they were applied, and their value***

MTA Response: The mode-specific constants for the alternatives were developed using a methodology developed for all three New Starts corridor studies in Maryland following FTA's Proposed New Starts and Small Starts Policies, February 2007.

11. ***What is the predicted travel time for the Low-Investment JBR BRT alternative during off-peak periods? Please provide these travel times between all stations.***

MTA Response: Station-to-station travel times for the Year 2030 peak periods were used since this is the input required for the Metropolitan Washington Council of Government regional travel forecasting model used for the corridor forecasts. Off-peak times are not needed for the evaluation of alternatives but would be prepared as for further analysis of the Locally Preferred Alternative.

12. ***Since the study was largely produced in 2007-08, and will not be submitted for new Start funding before 2009, please provide an explanation of why 2007 construction costs were used.***

MTA Response: Capital cost and operating & maintenance cost estimates were prepared and first presented at community meetings in late 2007. To avoid confusion by changing numbers solely for escalation, the estimates in 2007 dollar will be used for comparison among alternatives throughout the alternatives analysis process in the AA/DEIS document. Once a Locally Preferred Alternative is selected, the estimates will be updated to current year dollars for the New Start criteria submission.

13. ***Since MTA's new Medium-Investment BRT alternatives to Medical Center will involve buses traveling through the Woodmont pedestrian plaza throughout the day, please provide the assumptions used for speed, elapsed time, and plaza safety treatments.***

MTA Response: This alignment configuration was always the case for the Medium and High Investment BRT alternatives throughout the planning process. The new Medium-Investment BRT alternatives to the Medical Center do not involve any new configurations that have not been considered in the past. Plaza safety treatments are considered to be covered under planning level cost estimates developed for the station area.

14. ***It appears that the proposed Chevy Chase Land Company development at Connecticut Avenue has increased ridership for all alternatives except the JBR BR, yet the JBR Connecticut Avenue Station appears to be within the ½ mile catchment area. Please provide ridership data related to the Chevy Chase Land Company for all alternatives.***

MTA Response: The ridership estimates for all the alternatives are based on the population and employment forecasts for the Year 2030 contained in the "Round 7.0a" of the Metropolitan Washington Council of Governments regional travel forecasting model. These demographic forecasts develop in collaboration with the

local planning jurisdiction, including Maryland-National Capital Park and Planning Commission, at the TAZ level and do not identify specific development projects. That development is only included in the forecast to the extent that the current master plan for the county includes the project.

15. ***MTA has now removed from the Bethesda catchment area the third TAZ that SSE identified as being more than ½ mile from the Bethesda Purple Line station, yet High-Investment LRT ridership has increased. Please provide an explanation.***

    MTA Response: We do not fully understand your question. All TAZs in the regional forecasting model are considered in developing forecasts. Please provide further information for clarification.

16. ***What are the ridership estimates for all CCT alternatives if the new south entrance to Bethesda Station is not built? If this has not been calculated, please explain why.***

    MTA Response: The implementation of the Bethesda Station south entrance is being undertaken by Montgomery County as a considered part of the 2030 Future No-Build condition, meaning that it is a separate project with independent utility. Under current plans, it will be in place by the time any Purple Line Project would be operational. Therefore, all ridership forecasts assume the South Bethesda entrance.

17. ***MTA has continually stated that although 16 miles in length, most Purple Line trips will be short. This would mean that the spread of travel time differences for most trips will be considerably less than the end-to-end travel time difference of 46 minutes. Why, then, does the model still generate such great disparities in projected ridership?***

    MTA Response: These differences are not disparities but the result of the relative travel time differences among the alternatives for trips of various lengths for the auto and transit choices trip makers would have.

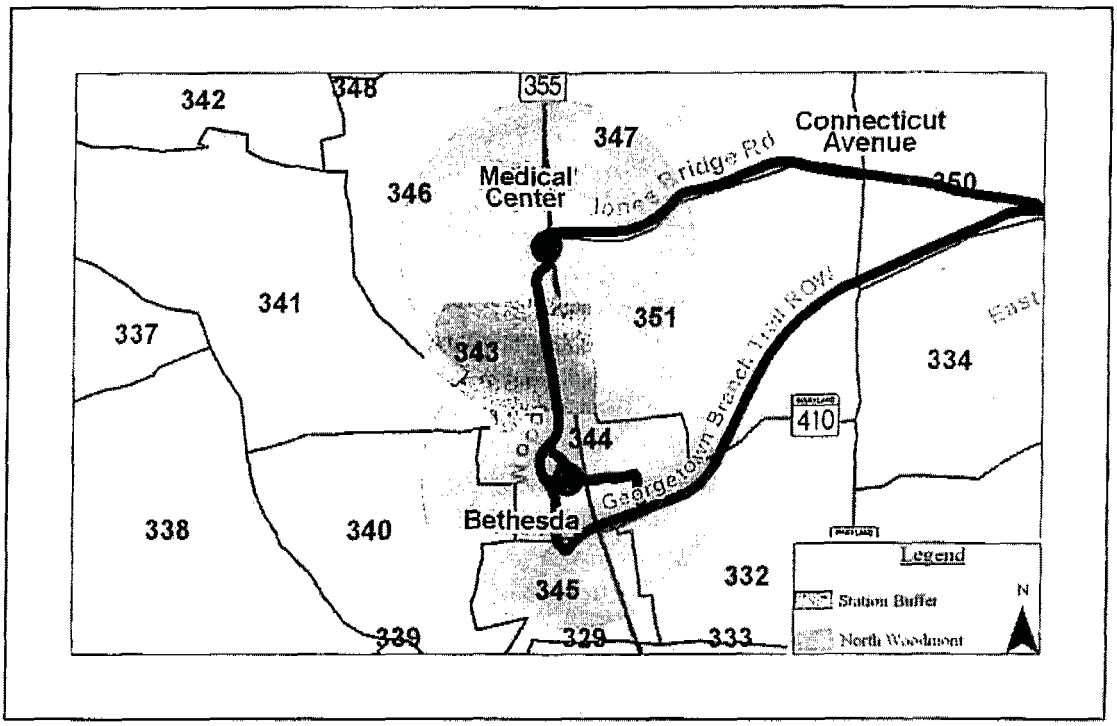
18. ***The 1-1/4 mile extension to Medical Center in MTA's new Medium-Investment CCT BRT alternative only increased capital costs over the originally proposed Medium-Investment BRT by less than 1%. Please provide calculations show how this is possible.***

    MTA Response: This alignment would be expected to utilize the existing station at the Medical Center Metro station and existing street alignments along Woodmont Avenue and Wisconsin Avenue – requiring little by way of additional capital costs.

19. ***Ridership estimates for the new North Woodmont Station.***

    MTA Response: SSE has maintained throughout that the North Woodmont area was not served by alternatives developed to date. The travel forecasting model accounts

for all population and employment in the TAZ in developing forecasts of the number of trip that would use a particular mode (auto or transit) for travel and assigns it to a most convenient station in the case of transit. The map depicted below identifies that the ½ mile walk shed overlaps for the stations identified in the AA/DEIS for the Low Investment BRT options provide service to approximately 90% of the TAZ identified (see map below). Ridership estimates for the North Woodmont area would then be expected to be shared among the NIH/NNMC station, the Bethesda Metro Station and the new North Woodmont station. The combined ridership for those three stations is 7,800.



20. ***MTA indicated at the August 26th meeting that a new alignment had been adopted through the University of Maryland. Please provide details for all six alternatives, including station location(s), running time, and projected ridership. Please compare with previous routing. Was this alignment incorporated into the MTA's July 31st presentation data?***

MTA Response: Alignment information for the University of Maryland is provided in the AA/DEIS as are station locations and ridership. The determination of routing alternatives through UMD has been an ongoing process. However, existing alternative routes have been set for some time. Please identify the reference to "previous routing".

21. ***During the past 10 month of public outreach, there have been extensive verbal and written allegations that BRT would employ "smelly, polluting diesel buses." In***

response to SSE's analysis, MTA states that there will be no significant difference in emissions between the two modes. We can find no reference to this, though, in any reports or presentations that MTA has made public. Please document where and how MTA has disseminated this information.

MTA Response: The AA/DEIS identifies the differences in emissions expected for LRT and BRT on a regional level for existing power generation sources / transit emissions. It is, has been, and will remain MTA's position that both modes provide environmental benefits when compared to auto travel.

22. ***We have read that MTA has added two new stations along Wayne Avenue in response to the community. Please confirm, and if so, indicate running time impact for all six alternatives and whether this is included in the data presented by MTA on July 31st.***

MTA Response: Station locations are noted in the AA/DEIS. Running times are included in the Transportation Tech Memo and Chapter 3 of AA/DEIS.

23. ***MTA has assumed that all projected new Purple Line trips are diverted auto users. Why is there no allowance for new trips by non-auto users? What impact would this have on cost-effectiveness calculations?***

MTA Response: The MTA has differentiated between trips that are new users from automobiles as well as those that are expected to be diverted from other transit services. Cost-effectiveness calculations were derived based on model results – as is standard practice. FTA procedures for ridership forecasting use a fixed future trip table where trips are either auto trips or transit trips and do not allow for the inclusion of "induced" (new non-auto users) trips are included. There is some evidence in the industry that fixed guideway transit does generate "induced" trips, especially in the off-peak periods, but FTA does not permit these to be included in the cost-effectiveness calculations.

Thank you for your continued input on the Purple Line project. We look forward to scheduling the meetings to meet with Town residents to understand their concerns relative to the Purple Line master plan alignment and also with your consultants to provide any additional clarification on project analysis to date.

Sincerely,

Michael D. Madden
Chief, Project Development
Office of Planning

cc: John D. Porcari, Secretary, MDOT
Henry M. Kay, Deputy Administrator, Planning and Engineering, MTA

Exhibit 7

Md. Transit Admin., Assessment of "Analysis of MTA Purple Line Alternatives and Alignments" and Other Documents Prepared by Sam Schwartz Engineering

August 14, 2008

Technical Memorandum

Assessment of "Analysis of MTA Purple Line Alternatives and Alignments" and Other Documents Prepared by Sam Schwartz Engineering

Maryland Transit Administration
August 14, 2008

Table of Contents

Executive Summary

The Town of Chevy Chase has hired Sam Schwartz Engineering (SSE) to represent their concerns with the ongoing Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) for the Purple Line. SSE and the Town of Chevy Chase specifically argue against and have indicated their opposition to those Purple Line alternatives that provide the potential for a transitway along Montgomery County's adopted Master Plan alignment. This right-of-way provides a direct connection between Bethesda and Silver Spring on a right of way specifically purchased for that purpose.

The MTA has carefully reviewed the following written materials provided to the MTA by the Town of Chevy Chase that are based on the their consultant's viewpoints and analysis:

- April 17, 2008 letter from Mayor Linna Barnes with attached memorandum to Maryland Secretary of Transportation John Porcari
- April 22, 2008 memorandum to Chevy Chase Town Council from SSE regarding drawings provided by Maryland Department of Transportation Secretary's Office
- April 23, 2008 report prepared by SSE for the Town Council of Chevy Chase titled "Analysis of MTA Purple Line Alternatives and Alignments"
- June 9, 2008 memorandum from SSE to Pat Burda, Chair of the Long Range Planning Committee, Town of Chevy Chase
- July 31, 2008 revised version of "Analysis of MTA Purple Line Alternatives and Alignments"
- Undated slides titled "Jones Bridge Road BRT Treatments – Concepts for Further Analysis"

SSE has presented various analyses and derived information to the Town of Chevy Chase - and in various public settings – presenting it as engineering fact. The MTA stands behind the findings and analysis of the ongoing planning process for the Purple Line, and has issued this report in response. The purpose of this MTA report is to identify the key inaccuracies, assumptions and misleading conclusions presented by SSE and as a way to add clarity to ongoing discussions. The MTA also feels that it is important to defend the validity and soundness in both the information and process developed as part of the AA/DEIS for the proposed Purple Line.

Findings

The MTA has reviewed the various reports and has concluded that the issue of connectivity between the Silver Spring CBD, the Bethesda CBD and the government agencies near the Medical Center Metro Station – National Institutes of Health and the National Naval Medical Center – is the primary focus of attention from their analysis.

It has been observed that the SSE reports rely on aggressive advocacy for an alignment away from the Master Plan alignment and presents incomplete or unrealistic descriptions

of options, utilization of incorrect or poorly applied engineering practices, and inclusion of explanations of the FTA New Starts process that were not comprehensive enough to provide the reader with a strong understanding of the alternative selection process.

In general, the methodologies applied by SSE often do not conform to best practices in transit planning and engineering, and instead rely upon assumptions and accusations that would be found unacceptable by the Federal Transit Administration (FTA). The SSE reports also present issues based on research conducted outside of the MTA planning process and provides generalized impacts to MTA's plans for the alternatives along the Master Plan alignment that are based on broad speculative planning assumptions and an inaccurately defined project right-of-way.

New Starts Process

SSE asserts in their report that a lowest cost option may be the only way to receive Federal approval for the project. The reality is that the project must receive support from local stakeholders, meet cost-effectiveness criteria, and be an effective transit route. A route that has higher costs could provide more effective travel and therefore be preferred by all local stakeholders. The impact of travel time delay on ridership for those traveling to the Bethesda CBD by way of Jones Bridge Road would also be one of the criteria considered in the State of Maryland's decision making process.

Project Segmentation

SSE begins their analysis from a fundamentally invalid basis in that they were tasked to evaluate and consider only the Bethesda to Silver Spring portion of the 16-mile Purple Line corridor. Bethesda to Silver Spring certainly represents a critical section of the corridor and the largest travel market of the Purple Line. However, the project is much more than this 4.5-mile corridor addressed in this discussion and to consider solely this piece of the corridor ignores the needs, impacts and benefits that the remaining 11.5 miles of the corridor has in terms of addressing the transportation problems of the 16-mile Purple Line. Alternatives evaluated for and decisions made relative to the segment between Bethesda and Silver Spring will clearly have substantial implications for the entire length of the corridor.

The portion of the project east of Silver Spring includes two additional critical links to Metrorail, two MARC lines and AMTRAK, extensive connecting bus services, the activity and employment centers at Takoma/Langley Park, College Park and the University of Maryland, and New Carrollton. This short-sighted perspective also disregards the benefit of connecting two of the most heavily developed counties in the State of Maryland. Key factors such as travel time, transit mode, and accessibility must be considered from a corridor-wide perspective. Further, to assess and consider alternatives only on the basis of one part of a larger corridor is not consistent with the Federal Transit Administration (FTA) planning and environmental documentation requirements.

Market Priority

SSE claims that the National Institutes of Health/National Naval Medical Center (NIH/NNMC) employment center is a market of such priority that the Purple Line alignment along Jones Bridge Road should be the one of highest value. SSE further supports this conclusion by pointing to the impacts to travel in the Bethesda area that would result from the Base Realignment and Closure (BRAC) plans. However, what this analysis ignores is the effect a Jones Bridge Road alignment would have on potential Purple Line trips to the Bethesda CBD. MTA analysis confirms that downtown Bethesda is, and will be, the primary transit market with its mix of employment, residential, government, entertainment and retail uses. Transit travel using a Jones Bridge Road alignment option will have a substantial negative effect on Purple Line travelers to Bethesda.

MTA analysis has shown that travel times to the NIH/NNMC complex, via the Purple Line Master Plan alignment and a transfer to the Red Line are comparable or better than possible travel times to the identified NIH/NNMC station at the intersection of Jones Bridge Road and Rockville Pike. In short, the travel time to NIH/NNMC is comparable (and less for a surface connection to the North Woodmont area) – even *after* the connection to the Bethesda CBD has already been made using an alternative along the Master Plan alignment. Employees or those with other trip purposes (entertainment, shopping, government, etc.) to the Bethesda CBD (or from Bethesda to the Silver Spring CBD) would be inconvenienced by travel along a Jones Bridge Road alignment.

Fare Policy

SSE uses existing Bus to Rail transfers in the Washington area as its basis for determining travel cost comparisons for travel between Silver Spring and NIH/NNMC. This assumption is inconsistent with the goals of the MTA on the Purple Line to create a transit system which is seamless for regional travel. These assumptions are also premature and speculative in that the Washington Metropolitan Area Transit Authority (WMATA) has yet to determine how it will integrate LRT or BRT system into the region. Their findings are without merit.

Jones Bridge Road Traffic

SSE asserts that Jones Bridge Road traffic could be decreased and ridership increased using a Jones Bridge Road alignment – noting that BRAC is expected to increase traffic on Jones Bridge Road. This analysis ignores the potential travel time impacts to the BRT vehicles that would result due to increasing traffic (including turning vehicles) along the corridor as compared to travel along a dedicated right of way using the Master Plan alignment. Only dedicated travel lanes and TSM implementation along Jones Bridge Road at Connecticut Avenue and Rockville Pike (both of which are unlikely to gain approval from either SHA or Montgomery County) can make the Jones Bridge Road alternatives competitive with other alternatives.

The only way to reduce the number of person trips made along Jones Bridge Road would be to provide transit along the Master Plan alignment to a transfer with the Metrorail Red Line providing a preferred travel option to Jones Bridge Road.

Travel Times

In their analysis, SSE identifies various travel times for the BRT option – including a 6 mph average travel time (April, 2008) for end to end travel (New Carrolton to Bethesda) on the MTA Low-Investment BRT Alternative. This calculation was determined through a fundamental error, and in fact the estimated travel speed for the Low-Investment BRT is approximately 10 mph. This travel speed is directly comparable to BRT systems around the world and the United States.

The Medium and High BRT options using the Master Plan alignment have average travel speeds of 13 mph and 16 mph – which are comparable or better than speeds obtained on well known BRT systems.

Travel Speeds

SSE uses early morning (pre 7 a.m.) current year transit travel times as its method of estimating possible BRT travel speeds (approximately 15.6 mph in their April report and 14.4 mph in the July memo - utilizing the same methodology) along the Jones Bridge Road alignment. This assumption is incorrect since it ignores the realities of travel speeds in the peak periods, intersection delay, minimal lane widths, AND future year conditions along Jones Bridge Road with employment growth expected in the Medical Center area and in the Bethesda CBD. Achieving travel speeds claimed by SSE would require dedicated BRT lanes and signal prioritization on Jones Bridge Road intersections at Connecticut Avenue and Rockville Pike. Roadway widening would be needed to accommodate dedicated lanes at intersections (a concept not explored by SSE), which would cause greater property impacts to homes, parks and schools than under the MTA's Low Investment BRT Alternative. This roadway widening need does not take into account Maryland State Highway Administration's ongoing study to improve Jones Bridge Road at the two intersections which would result in a cumulative impact to properties at these locations.

Emissions

SSE uses a source for its emissions discussion, a report (Breakthrough Technologies) issued by an advocacy group (The Bus Rapid Transit Policy Center) that was discredited and refuted through work completed for the Transportation Research Board (TRB). The TRB report notes that light rail emissions (calculated regionally) would be expected to be better than BRT for VOC, NO_x and CO. Looking forward sources of power for both are improving which will result in a clean transportation alternative when the Locally Preferred Alternative is implemented regardless of the mode chosen.

From a broader perspective the implementation of a system that maximizes the effectiveness for travelers and makes transit a preferred mode which is supported by directed land uses as station areas has the potential to change travel behaviors and have emissions benefits in excess of those achieved by mode choice solely.

Woodmont East Plaza

SSE utilizes a graphic of its own creation (not created by the MTA) to depict tail tracks - with varying depictions of an unattractive barrier fence - that extend 400 feet to the curb at Woodmont Avenue and indicates that they will be used to switch direction of Light Rail vehicles, provide peak hour operations, and provide regular maintenance to vehicles.

The reality is that the tail track at Bethesda would be only for temporary use were a train to break down. Track switching in this area would not occur. The Purple Line maintenance facility would be located near the Lyttonsville Station only 3 miles away – making maintenance use of the Woodmont East property redundant. Track switching has at no time has been proposed to take place in this area.

Also, the Montgomery County Planning Board has approved a development at Woodmont East which was coordinated with the MTA and Montgomery County to ensure that it accommodates the Purple Line. SSE's assertion that the plans are in conflict is incorrect. The MTA also never proposed a barrier or fencing in this area as the operation of light rail tracks in mixed pedestrian environments – particularly one with the limited use expected at Woodmont East – is accepted practice worldwide.

Trail Width

SSE analyzed the trail sections presented in early MTA project materials and has concluded that the MTA is conveying an expectation to the public that is not likely to be met. SSE claims that a 10 foot trail width may not be possible in all locations due to constraints and that costs for retaining walls were not calculated. The reality is that the AA/DEIS plans indicate that a 10-foot width is possible and was designed/engineered for the corridor. In addition, retaining walls were part of the cost calculations determined for the Master Plan alignment options. The concepts for the trail have been presented at numerous public meetings and events and many of the revisions to the trail concepts were the direct result of the public input process.

SSE asserts that the MTA drawings showing a typical section along the Master Plan right-of-way are not typical and that this design for the transitway and parallel trail is unlikely along all but about 600 feet or 80% of the trail length (not counting the portion along the Columbia Country Club). Through further analysis, the MTA is able reaffirm that the typical section drawings for the Master Plan right-of-way are possible for the majority of this right-of-way and would in fact be implemented if this alignment is part of the Locally Preferred Alternative selected for the Purple Line project.

Impacts to Trees Along the Master Plan Alignment

SSE uses dated analysis to describe potential impacts to trees along the Master Plan alignment – conditions that have certainly been changed through the natural cycle of a tree lifespan. In order to support their claim, SSE exaggerated the potential impact by showing tree removal outside of the right-of-way or area of need for the transitway that would not be necessary. Further, it should be pointed out that there are trade offs between impacts to trees within a right-of-way purchased and specifically reserved for transportation, as compared to those private property impacts along Jones Bridge Road.

Further SSE has identified that storm water run-off would increase in this area due to Purple Line construction. Stormwater management is an important element of all Federally funded transportation projects. Design alternatives forwarded to date, including grassy areas along light rail alternatives, have been developed to address stormwater issues. Further refinements of management options will be developed as the project progresses.

Introduction

The Town of Chevy Chase has retained Sam Schwartz Engineering (SSE) to provide comment on the analysis presented by the Maryland Transit Administration for the segment of the Purple Line connecting downtown Silver Spring and the Bethesda CBD. SSE issued a number of reports outlined in the list below which criticize some of the assumptions of the planning process to date and concludes that the Jones Bridge Road alignment should be the preferred alignment. That list of documents include:

- April 17, 2008 letter from Mayor Linna Barnes with attached memorandum to Maryland Secretary of Transportation John Porcari
- April 22, 2008 memorandum to Chevy Chase Town Council from SSE regarding drawings provided by Maryland Department of Transportation Secretary's Office
- April 23, 2008 report prepared by SSE for the Town Council of Chevy Chase titled "Analysis of MTA Purple Line Alternatives and Alignments"
- June 9, 2008 memorandum from SSE to Pat Burda, Chair of the Long Range Planning Committee, Town of Chevy Chase
- July 31, 2008 revised version of "Analysis of MTA Purple Line Alternatives and Alignments"
- Undated slides titled "Jones Bridge Road BRT Treatments – Concepts for Further Analysis"

The information presented on the following pages was compiled to refute many of the assertions made by SSE in the documents issued to date.

New Starts Process

It is noted that SSE has misstated the basic fundamentals of the New Starts planning process – which is that the development and assessment of alternatives is to take place in a manner which responds to the project's purpose and need. To summarize some of the key points, the goals for this project are to:

- Reduce travel time between activity centers (Bethesda to Silver Spring, etc.)
- Reduce transit travel times in the corridor
- Increase employers' access to job pools
- Support local, regional and state policies and adopted master plans
- Demonstrate that the overall benefits of the transit improvements warrant their capital and operating costs

SSE describes the New Starts process, the advantages of BRT vs. LRT, costs, environmental impacts, land use considerations and etc. These topics are a part of the decision-making process for New Starts projects and have been included in every step of the project to date.

BRT and LRT options were developed as alternatives for connecting Bethesda and Silver Spring because they are viable options – that is the basis of the New Starts process. It should be clarified that the lowest cost option is not the only factor in determining which alternative is selected for New Starts funding. A project must meet cost effectiveness targets for approval but the effectiveness of the alternatives against transit system improvements (TSM) or no-build, input from all project stakeholders, financial commitment of local and state officials and other factors are all considered as part of the New Starts process. A higher cost alternative that provides more benefits to users would then be seen as a preferable alternative than one of lower cost that provides fewer benefits. Stating that the lowest cost option is the only way to obtain Federal funding is not an appropriate representation of the process.

Project Policy Issues

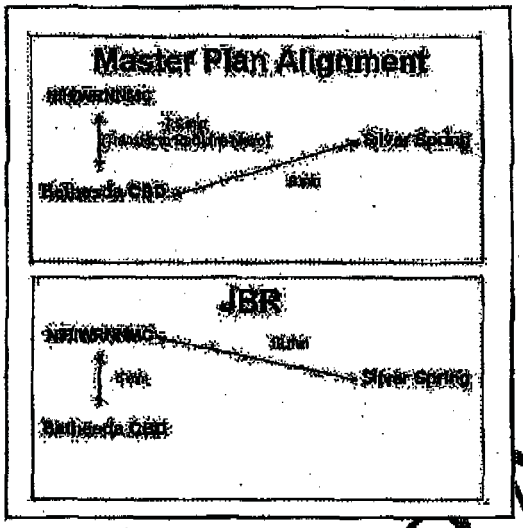
There are also some pertinent policy questions that are not discussed in the SSE report due to its concentration on one segment of the overall project but which warrant consideration as decisions in the Silver Spring to Bethesda segment will have implications the length of the corridor. A discussion of these issues has been included in this report for consideration.

The segment issues identified in the SSE report speak to a number of specific questions for the segment of the Purple Line corridor connecting Silver Spring to Bethesda. There are, however, a number of policy issues that would need to be addressed corridor wide in order to be able to draw conclusions for what has been presented. The project policy issues have been presented below for information provided by both the MTA and SSE analysis to present the decisions at the broader level and without regard for MTA's disagreement with the methodologies used by SSE in their analysis.

These issues include:

Travel Time – Which of the two discussed options is more desirable from a PL corridor wide perspective?:

- A travel time of 9-10 minutes between the Silver Spring CBD and Bethesda CBD which is provided by a highly reliable exclusive right-of-way - with connecting transit services to the NIH/NNMC area.
- A travel time of 24 minutes between the Silver Spring CBD and Bethesda CBD – along a mixed-travel roadway with delays of varying length caused by crossings of two major regional arterials between the two CBDs – but that provides a one-seat ride to a station in the NIH / NNMC area .



In short – what is the perspective for travelers along the entire corridor for decisions made for connections between Silver Spring and Bethesda?

Mode – A decision on mode (LRT or BRT) impacts not only the citizens of Chevy Chase but also those along the entire length of the corridor. A full LRT option along Jones Bridge Road has not been identified as a viable alternative due to several considerations, including restrictions in available right-of-way. BRT is an option along the Master Plan alignment and in rights of way identified for both modes for the remainder of the corridor. Limited BRT is possible along the JBR alignment.

Environmental Impacts – Decisions in the Purple Line corridor will affect the natural and human environment. Is the desire to create a connection between Purple Line destinations worth the identified impacts to those areas where impacts have been identified? The SSE report focuses extensively on the loss of trees in the County-owned right of-way, as well as impacts to the interim trail, but does not discuss impacts to the neighborhoods along Jones Bridge Road. It should be noted that the MTA's JBR alignment has minimal impact on trees and private property, while the SSE BRT alignment concept results in both the removal of the street trees and the acquisition of property from the front yards of homes on Jones Bridge Road.

Cost - At what value do the stakeholders in the corridor and the citizens of Maryland place on the various alternatives, associated travel times and accessibility? This will be an issue on mode, alignment, station locations, grade separations, etc. And, what are the funding sources by which the selected alternative can be funded.

These are the overarching policy issues that will have to be addressed in the context of the analysis presented in the SSE report and are included in the New Starts process for the project currently underway. It will be important for readers to keep the policy issues in mind as discussions of the technical analysis specifics for this one segment of the 16 mile project are debated.

Purple Line Markets

The question of markets and the priority of those markets are important to this discussion, as the selected alternative, whether the Master Plan or Jones Bridge Road, will have real and noticeable differences in travel times and accessibility to the Bethesda CBD.

An understanding of a travel market includes looking at who works in an area, who lives there, and what other destinations are there (e.g. government, retail, entertainment). The comparison of which market is greater, the NIH/NNMC or downtown Bethesda, must consider all of these. The SSE report only considers employment, and while NIH/NNMC is a major employer; downtown Bethesda has not only a large employment base, but a substantially larger residential population, as well as considerable retail and entertainment activity which will generate transit ridership. This clarification is important, and has been ignored in the SSE report.

Market Priority

In its most basic sense this is a discussion about which travel market should be considered the primary market, thereby having precedence over the other. Whichever alignment is selected, one group of passengers will be inconvenienced by delay in arriving at their destination, or the need to transfer to another transit line.

SSE claims that the National Institutes of Health/National Naval Medical Center (NIH/NNMC) employment center is a market of such priority that the Purple Line alignment providing service along Jones Bridge Road should be the one of highest value. SSE further supports this conclusion by pointing to the impacts to travel in the Bethesda area that would result from the Base Realignment and Closure (BRAC) plans. However, what this analysis ignores is the effect a Jones Bridge Road alignment would have on potential Purple Line trips to the Bethesda CBD. MTA analysis confirms that downtown Bethesda is, and will be in the future, the primary transit market with its mix of employment, residential, government, entertainment and retail uses. Transit travel using a Jones Bridge Road alignment option will have a substantial negative effect on Purple Line travelers to Bethesda.

It seems obvious that based solely on speed of service, the larger market should receive preferential treatment and the more direct alignment should be selected. However, the speed of service is just one factor in the evaluation of alternatives; and environmental impacts, impacts to the larger transportation system, and cost must be considered.

In an effort to further define the market for transit trips an analysis was performed on the demand forecasting data to determine - by TAZ in the Bethesda area – the total number trips expected to be produced and attracted to each of the zones in the Bethesda market. The Bethesda CBD is defined by two zones (344, 345) while the Medical Center area is defined by two other zones (346, 347). The total number of all daily trips expected to start or end in the Bethesda CBD is approximately 260,000 while the number of trips expected to start or end in the Medical Center are is approximately 110,000.

It is important to note that trips on the Purple Line expected to start or end at the Bethesda CBD would be negatively influenced by the travel delay associated with the Jones Bridge Road alignment resulting in less ridership and less travel time savings for trips to the CBD.

The build alternatives for this project were developed to provide modal and cost options for serving that market. The Jones Bridge alignment was included as a low cost - albeit less effective - alternative to provide a mixed-traffic routing for serving the Bethesda terminus of the corridor. This alternative was not designed to serve the Medical Center area as a different priority for the western terminus – one that carries precedence over the CBD. All build alternatives along the Master Plan alignment do include improved service to the Medical Center area by means of enhanced bus service between Silver Spring and the Medical Center area along Jones Bridge Road as well as offering improved travel time using a combination of the Purple Line and the Metrorail Red Line to make that connection. Shifting the focus of the BRT alternative along Jones Bridge Road to principally serve the Medical Center area and incorporating the additional lanes and other features discussed in the SSE report have the effects of diminishing the transit service effectiveness and benefits to the much larger downtown Bethesda market. This approach appears to be done for the primary purpose of shifting away from the Town of Chevy Chase what are seen as the adverse effects of using the Master Plan alignment - for the explicit purpose it was purchased - over to communities along Jones Bridge Road.

Fare Policy

SSE bases its findings for the fare analysis on an assessment of existing Metro Bus operations and Metro transfers in current conditions to derive cost factors for various trip origins and destinations. It states that BRAC actions will result in more customers who have to pay a higher fare to travel between Medical Center and points along the Purple Line.

The MTA has maintained throughout the planning process that the Purple Line will be an integrated part of the regional transit system and fare policies are expected to reflect that goal. Assuming other conditions is not appropriate. In addition, it is important to note that the travel conditions for those accessing NIH and NNMC will be improved over existing conditions for all Purple Line alternatives.

The Washington Area Metropolitan Area Transit Authority (WMATA) has not yet issued a policy statement on the integration of BRT/LRT systems with the system operated by

the authority. Until that policy statement is issued, and until the MTA negotiates the fare policy for the Purple Line, conclusions on the fare policy are speculative at best.

Technical Analysis

SSE presents technical analysis at a very broad and undefined level in many of its conclusions to make the point that the JBR alignment should be the preferred alignment for the Purple Line alternatives. In order to respond to this analysis the MTA had to make assumptions in many places in an attempt to replicate the findings of SSE in its derivation of recommendations and in many places this was not possible. The sections below outline the conclusions of the SSE report, a listing of considerations, and the MTA analysis conclusion.

Low BRT Defined

In an effort to provide further clarity to the discussion of how the low BRT alternative was developed and what routing and infrastructure recommendations are included, the definition of the alternative has been included below.

> The Low Investment BRT Alternative would primarily use existing streets to avoid the cost of grade separation and extensive reconstruction of existing streets. It would incorporate signal, signage, and lane improvements in certain places. This alternative would operate mostly in mixed lanes with at-grade crossings of all intersections and queue jump lanes at some intersections. This is the only alternative that would operate on Jones Bridge Road, directly serving the National Institutes of Health and the National Naval Medical Center near Wisconsin Avenue and Jones Bridge Road. It is also the only alternative that would use the bus portion of the new Silver Spring Transit Center.
>
> From the western terminus in Bethesda, Low Investment BRT would originate at the Bethesda Metro Station bus terminal. The alignment would operate on Woodmont Avenue within the existing curb. At the Bethesda Station, the buses would enter the station via Edgemoor Road and exit onto Old Georgetown Road.
>
> At Wisconsin Avenue, just south of Jones Bridge Road, the transitway would remain on the west side of the road in exclusive lanes. Low Investment BRT would turn onto Jones Bridge Road where the transit would operate in shared lanes with queue jump lanes westbound at the intersection with Wisconsin Avenue and westbound for the intersection at Connecticut Avenue. Some widening would be required at North Chevy Chase Elementary School.
>
> The alignment would continue along Jones Bridge Road to Jones Mill Road where it would turn right (south) onto Jones Mill Road. Eastbound on Jones Bridge Road would be a queue jump lane at the intersection. From Jones Mill Road the alignment would turn east onto the Georgetown Branch right-of-way,

where a new exclusive roadway would be constructed, with an adjacent trail on the south side.

Low Investment BRT would continue on the Georgetown Branch right-of-way, crossing Rock Creek Park on a new bridge, replacing the existing pedestrian bridge. The trail would be on an adjacent bridge. A trail connection to the Rock Creek Trail would be provided east of the bridge. The alignment would continue on the Georgetown Branch right-of-way until the CSX corridor at approximately Kansas Avenue.

At this point the alignment would turn southeast to run parallel and immediately adjacent to the CSX tracks on a new exclusive right-of-way. The trail would parallel the transitway, crossing the transitway and the CSX right-of-way east of Talbot Avenue on a new structure and continuing on the north side of the CSX right-of-way. The transitway would continue on a new roadway between the CSX tracks and Rosemary Hills Elementary School, and continue past the school. The transitway would cross 16th Street at grade, where a station would be located. The transitway would continue parallel to the CSX tracks to Spring Street, at which point it would connect to Spring Street and turn to cross over the CSX tracks on Spring Street. The alignment would continue on Spring Street to 2nd Avenue where it would turn east. BRT would operate in shared lanes on Spring Street and Second Avenue.

Low Investment BRT would cross Colesville Road at grade and continue up Wayne Avenue to Ramsey Street, where the BRT would turn right to enter the Silver Spring Transit Center at the second level.

SSE BRT Concepts

SSE makes a point that travel along JBR could be improved with the application of all BRT principals – specifically "the MTA should consider implementing exclusive bus lanes to speed BRT travel". The specifics of that potential are further defined in later project documents when BRT strategies for Jones Bridge Road are presented.

All of the SSE alternatives shown rely on utilization of a very limited right of way and result in sub-standard conditions for all roadway users – including BRT vehicles. A 10 foot lane is recommended only in limited situations and not in areas with speeds similar to those obtained on Jones Bridge Road in off-peak periods – particularly in adjacent lanes where sideswiping could result in sideswipes. Lane width is an issue which would impact both SSE recommendations and the Low Investment BRT alternative.

Figures 2 and 3 below depicts the conditions that would be recommended for the main line (not station areas or at intersections) segments of the JBR alignment between Connecticut Avenue and Rockville Pike were the road to be built to standards for BRT vehicles on dedicated lanes, automobiles and bicycles (as JBR is a identified bicycle way in the Montgomery County Master Plan). This configuration would yield the highest two-directional travel times for the corridor for BRT.

Figure 2 - BRT Dedicated Lanes Cross-Section for Jones Bridge Road – Connecticut Ave to Rockville Pike – Built to Standards

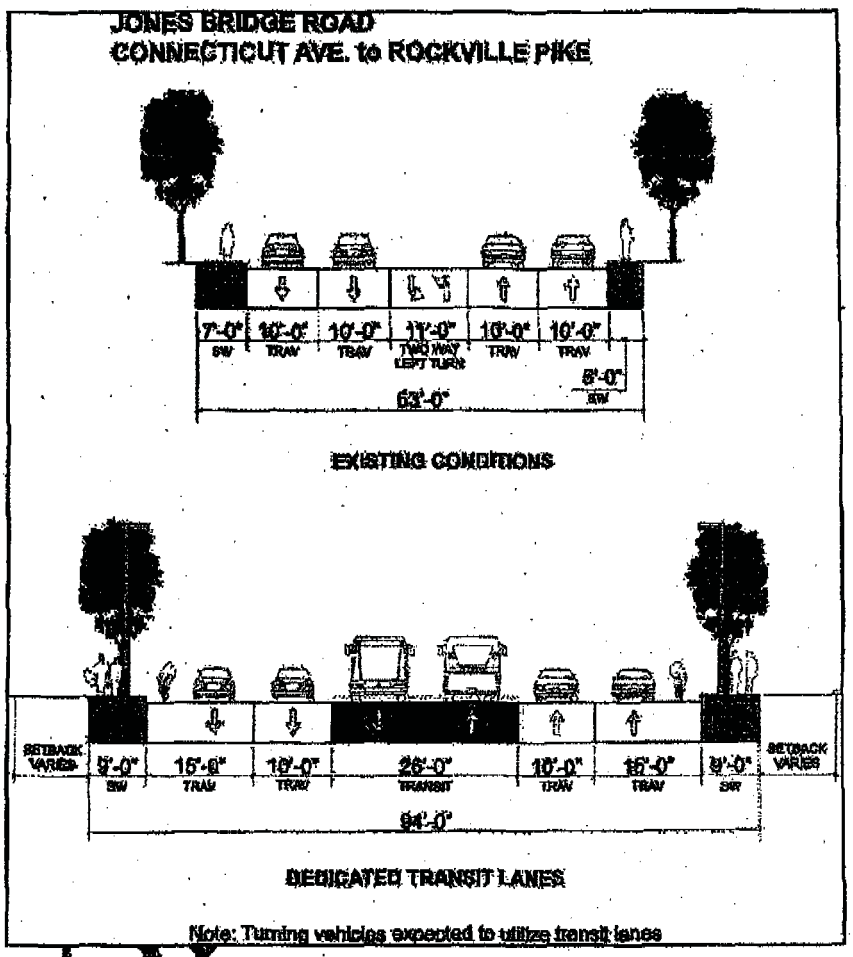
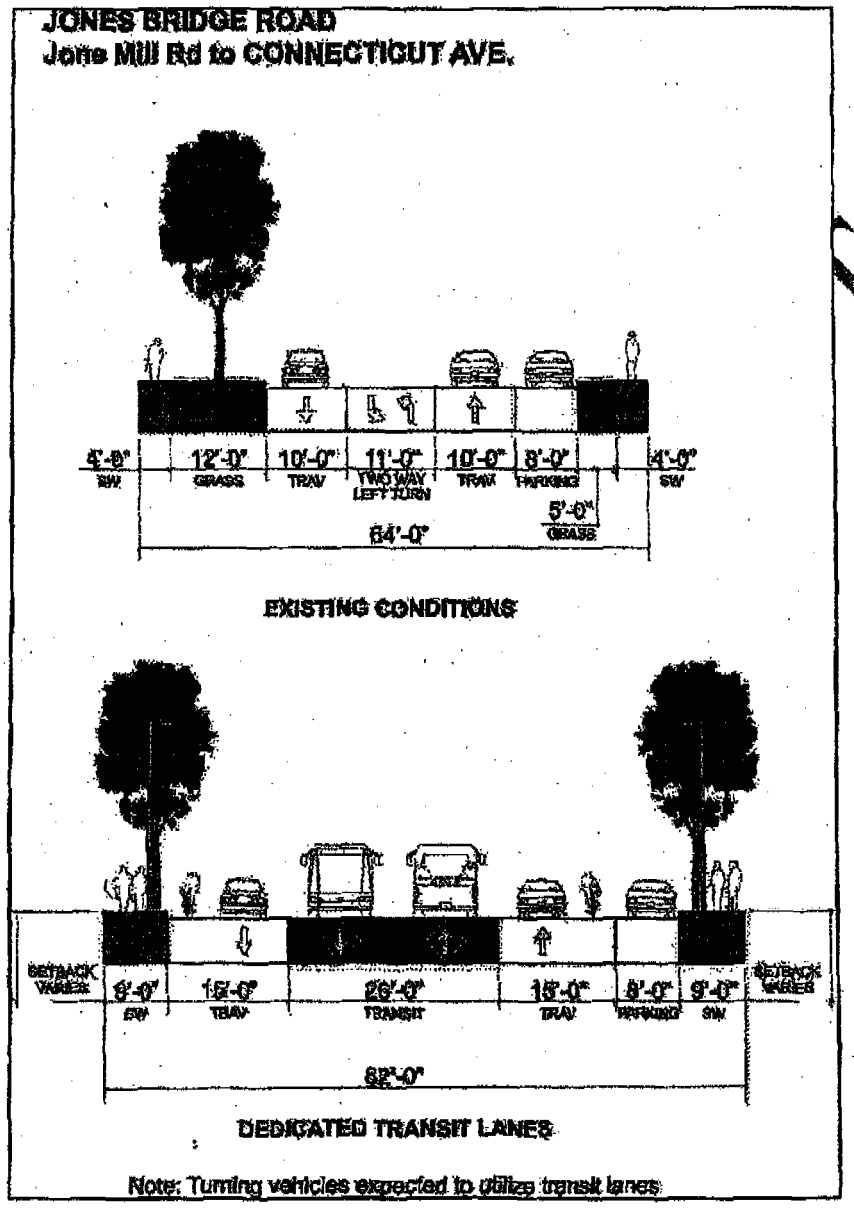


Figure 3 - BRT Dedicated Lanes Cross-Section for Jones Bridge Road – Jones Mill Road to Connecticut Ave – Built to Standards



As noted – the BRT right-of-way needs to meet various standards is 82-94 feet for areas between stations and of approximately 110+ feet or greater at the station location. The existing width of Jones Bridge Road in parts of this segment is approximately 39-50' in from curb face to curb face in many sections and available right of way is insufficient to place the station location assumed by recommendations. The implementation of properly designed concepts would result in additional right-of-way needs along the length of the corridor – an action assessed previously by MNCPPC and the MTA and dismissed due to impacts to private property along the corridor including parks, schools and homes.

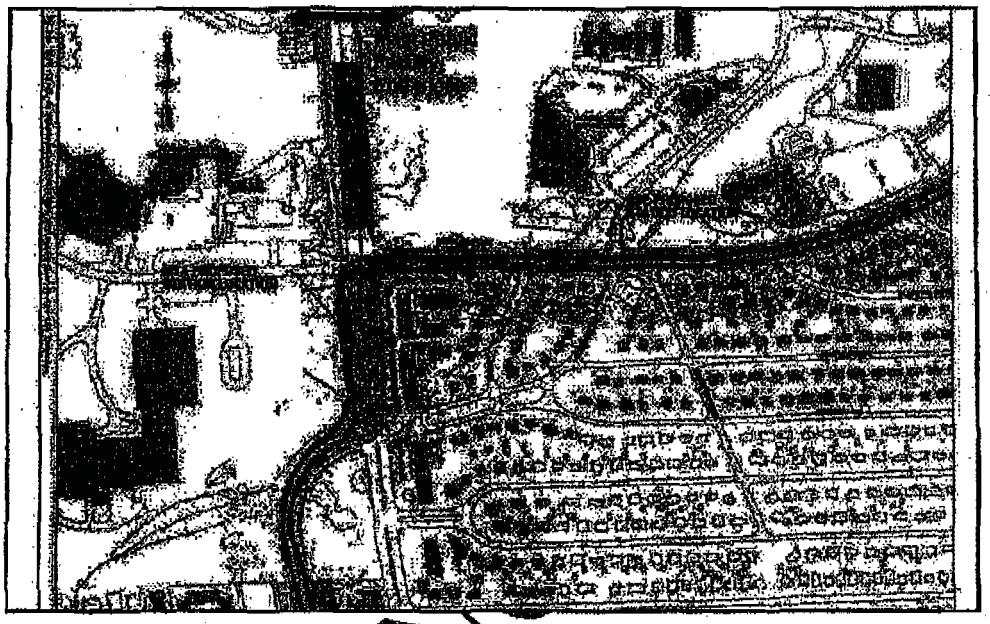
It also should be noted that the Maryland State Highway Administration is currently looking at design options for improving traffic patterns associated with BRAC changes at NNMC. Those recommendations are expected to be released over the next few months. Any property impacts along Jones Bridge Road would most likely be cumulative for BRAC roadway improvements and later Purple Line right of way needs increasing the impact to adjacent properties.

NNMC Station Location

SSE advocates for a station location along JBR providing better service to the NNMC area and resulting in a faster travel time (eliminating the Rockville Pike delay). With the concepts advocated by SSE this station could be located anywhere along the corridor. However, with the existing concept it would be more appropriate to place this station along the curb of the roadway. As noted below in Figure 4 a station location in this area – either for a would result in more impacts to the NNMC property and the property directly across from this station location.

As SSE did not specify a station location for this analysis but left it at the conceptual level – and to reduce corridor length/private property impacts - it was assumed that the station location would be located near the JBR entrance to the NNMC property and at a point where access to the planned queue jumper lane would be maintained.

Figure 4 - Assumed Jones Bridge Road Station Location – SSE Recommendation



Some other considerations not spelled out in the SSE analysis include:

- A station near the JBR entrance to NNMC would increase the distance from the NIH campus – increasing overall travel time for those accessing that campus. NIH's employment level is expected to be double that of NNMC by 2030.
- Any future connection to the Red Line in this area would be more difficult with a station location 500-800' (station location estimated as noted) from the Rockville Pike / JBR intersection. Providing the recommended connection to the Red Line and access points to NIH and NNMC would require funding higher than the $55 million specified in the SSE report.
- The main public entrances to the two facilities are located near the existing Medical Center Metro Station and - the location of the noted pedestrian improvement being explored by WMATA.
- The placement of a station at NNMC would decrease the effectiveness of the transit queue jumper lane and would (if the station were to be located along the curb) require weave movements to get back to the jumper lane and through right turning traffic.
- Industry best practice recommends placement of a BRT station on the far side of the intersection to maintain the effectiveness of the queue jumper lanes and Transit Signal Priority systems.

It also should be noted that the $55 million dollars that the SSE report identifies as potential funding for a connection to the Red Line is a Montgomery County planned and funded project to improve station access at the Bethesda Station and is not associated with the Purple Line – though the Purple Line will benefit from its location.

Transit Signal Priority

SSE makes the point that transit signal priority (TSP) could yield additional travel time savings the length of the corridor. It should be noted that transit signal priority was already included in alternatives for Jones Bridge Road (and throughout the Purple Line project) as it can be a time savings when used at appropriate intersections. The travel time estimates derived for the MTA analysis along Jones Bridge Road assumed TSP at its intersections with Glenbrook Parkway, Grier Road and Platt Ridge Drive.

The reality not discussed in the SSE report is that transit signal priority for Jones Bridge Road (20,000+ vehicles per day) is particularly difficult at Connecticut Avenue (70,000+ vehicles per day) and Rockville Pike (45,000 vehicles per day) due to the substantial impacts to the dominant traffic movement – people going into and out of DC or to the beltway - impacts to traffic system controls and the current and expected future condition of these intersections operating in heavily congested conditions. A preliminary analysis of the impacts of implementing Transit Signal Priority is presented in the pages below. The diagram below demonstrates graphically the obstacles to justifying the implementation of priority signaling for Jones Bridge Road at the two intersections.

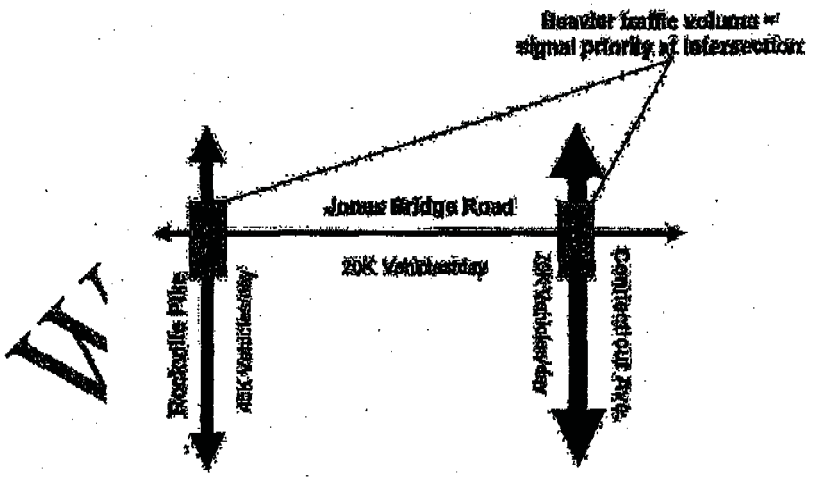


Table 1 – Delay along Rockville Pike

	Average Delay Per Vehicle					New Person-Hours of Delay with TSP
	No Queue Jump Lane	W/ Queue Jump Lane(s)	W/ Queue Jump & TSP	Change with TSP	% Change with TSP	
SB MD 355 AM Peak	44	44	100	56	127%	53
NB MD 355 AM Peak*	29	29	44	16	54%	8
SB MD 355 PM Peak	57	57	89	32	56%	19
NB MD 355 PM Peak*	45	45	52	7	16%	6

*Upstream intersection at Woodmont Avenue is 500' upstream. Northbound delay is based on the segment between the intersections (does not include segment south of Woodmont).

Table 2 – Delay for Eastbound and Westbound BRT Vehicles

	Average Delay Per Vehicle					Reduced Person-Hours of Delay with TSP
	No Queue Jump Lane	W/ Queue Jump Lane	W/ Queue Jump and / or TSP	Change with TSP	% Change with TSP	
EB BRT AM Peak	169		63	-106	-63%	18
WB BRT AM Peak	278	87	22	-65	-75%	11
EB BRT PM Peak	151		44	-107	-71%	18
WB BRT PM Peak	236	96	49	-47	-49%	8

On average, the delay to the BRT vehicles at the Rockville Pike intersection (and the travel time on the Jones Bridge Road portion of the Low BRT Alternative) could be reduced during the peak periods by **1.3 minutes on average**, if this TSP strategy were implemented.

Implementation of TSP at this intersection however; results in a significant increase in vehicle and person delay along Rockville Pike during the peak periods. The total

increase in person-delay along Rockville Pike during the peak periods is 86 hours; the travel time savings from TSP would reduce person-delay on the Purple Line by a total of 55 hours. These results show that providing signal priority treatments for 10 fully loaded BRT vehicles in each direction during the peak hour does not offset the increase in person delay along Rockville Pike.

It should be also noted that the implementation of TSP at this intersection with respect to the Purple Line, significantly reduces the total number of vehicles served at this intersection during the peak hours (from 6,100 to 4,800 during the AM peak and from 5,700 to 5,100 during the PM peak).

Table 3 – Delay along Connecticut Ave.

	Average Delay Per Vehicle					New Person-Hours of Delay with TSP
	No Queue Jump Lane	W/ Queue Jump Lane(s)	W/ Queue Jump & TSP	Change with TSP	% Change with TSP	
SB MD 185 AM Peak	79	79	135	56	71%	59
NB MD 185 AM Peak	15	15	36	21	140%	13
SB MD 185 PM Peak	70	70	230	160	230%	111
NB MD 185 PM Peak	65	65	127	62	95%	52

Table 4 – Delay for Eastbound and Westbound BRT Vehicles

	Average Delay Per Vehicle					Reduced Person-Hours of Delay with TSP
	No Queue Jump Lane	W/ Queue Jump Lane	W/ Queue Jump and / or TSP	Change with TSP	% Change with TSP	
EB BRT AM Peak	47		25	-22	-47%	-4
WB BRT AM Peak	278	133	24	-109	-82%	-18
EB BRT PM Peak	52		33	-19	-37%	-3
WB BRT PM Peak	148	64	28	-36	-56%	-6

On average, the delay to the BRT vehicles at this intersection (and the travel time on the Jones Bridge Road portion of the Low BRT Alternative) could be reduced during the peak periods by **0.8 minutes on average,** if this TSP strategy were implemented.

Implementation of TSP at this intersection however; results in a significant increase in vehicle and person delay along Connecticut Ave. during the peak periods. The total increase in person-delay along Connecticut Ave. during the peak periods is 233 hours; the travel time savings from TSP reduce person-delay on the Purple Line by a total of 31 hours. These results show that providing signal priority treatments for 10 fully loaded BRT vehicles in each direction during the peak hour does not nearly offset the increase in person delay along Connecticut Ave.

It should be also noted that the implementation of TSP at this intersection significantly reduces the total number of vehicles served at this intersection during the peak hours (from 6,900 to 6,000 during the AM peak and from 7,500 to 6,500 during the PM peak), without increasing the overall person throughput since non-TSP options serve the name number of BRT vehicles.

Travel Times

SSE identifies assumptions throughout the document that speak to improved travel times for the Jones Bridge Road alignment and the operation of BRT corridor wide. Much of their analysis is not re-producible using standard transit planning. For example:

1. On page 20 of the document (April, 2008) SSE states that the estimated travel speed for the BRT option (utilizing low-investment BRT travel times) is 6 mph which places it outside of acceptable travel speeds given identified best practices. The 6 mph speed is not correct. The end to end travel time identified for Low Investment BRT is 96 minutes – over a 16 mile corridor. *(Note: only the low investment BRT travel time was shown in the SSE report)* This equates to a running speed of approximately 10 mph. It is hypothesized that the lower figure was incorrectly calculated by dividing the total time by the total length. Given the incorrect assertion of the average operating speed the conclusions in the report based on this erroneous method of calculating operating speed were dismissed.

BRT speeds for the Purple Line alternatives are best for alternatives utilizing the Master Plan alignment.

For comparison:

Low BRT - 96 minutes – 10 mph
Med BRT – 73 minutes – 13 mph
High BRT - 59 minutes – 16 mph

Examples of successful BRT systems from around the world, including the United States show comparable travel speeds:

- Domestic

- Cleveland, Euclid Avenue = 12 mph
- Los Angeles, Wilshire and Venture Boulevards = 14 mph
- Boston, Silver Line = 8 – 13 mph

o International
- Bogota Columbia, TransMilenio = 13 mph
- Curitiba Brazil = 12 mph
- Porto Allegre Brazil = 11 – 14 mph
- Quito Ecuador = 11 – 12 mph
- Sao Paolo Brazil = 12 mph, 14 mph (different lines)

If travel speeds were to be used as the only measure of effectiveness, then the Master Plan BRT alternatives produce better average speeds throughout the length of the corridor.

2. SSE uses (page 19 – April, 2008) a travel-speed based on bus running time in pre-peak hour conditions (prior to 7 a.m.) for a WMATA bus (34) in the current year along a segment where a crossing of Connecticut Avenue is not included and fails to account for a free right onto Rockville Pike southbound. This travel speed (15.6 mph in the April report and 14.4 mph in the July memo – using the same methodology) can not be reproduced by MTA staff and consultants as the analysis used for this project is for future conditions in peak hour (congested) conditions which includes:

a) Development associated with BRAC improvements and growth at the NNMC/NIH area.
b) Increases in delay at Rockville Pike and Connecticut Avenue.

As a reference for current peak hours speeds the NNMC Final Environmental Impact Statement found travel speeds on Jones Bridge Road of NNMC EIS Traffic Study:

Westbound (AM Peak) = 10.3 min @ 10.0 mph,
Eastbound (PM Peak) = 7.7 min @ 13.4 mph.

The travel times developed by MTA based on site specific traffic counts and operations simulations are more reflective of expected future conditions in the corridor and include travel time savings for queue jumper lanes and TSP at intersections where the technology can be applied. The average speed assumed by the MTA is 11 mph for this segment. Times utilized by SSE would only be possible if the considerable infrastructure were put in place – resulting in severe right of way requirements, community impacts and the addition of delay to Connecticut Avenue and Rockville Pike.

SSE produced a travel table on page 20 of its April report (Table 2 – April, 2008) and again in later reports using "weighted" travel times for portions of the travel times of the SSE Jones Bridge Road concept and the Purple Line alternatives. The cited TCRP report was written to provide a reference for illustrative weights for various trip components as

used in the mode choice step of the travel forecasting models. The publicly available ridership estimates for the Purple Line alternatives are based on the appropriate and full use of weighting of travel time components within the regional travel forecasting model. The selective use of weighted time to create the SSE Table 2 is an incorrect and inappropriate application of this weighting concept outside the travel forecasting modeling process.

In the FTA recommended state of the practice procedures used to develop the ridership forecasts for the Purple Line alternatives, various time components of trip on an alternative are "weighted" to reflect observed traveler behavioral response – i.e., some types of time are seen as affecting a person's travel choice than others. A minute waiting for a transit vehicle, including at a transfer, is viewed as more onerous than riding in the vehicle. Similarly, travel time on a vehicle while stopped at traffic signal or delayed by traffic congestion, is seen as more onerous than travel time on a transit vehicle operating along a guideway (i.e. busway or rails). Applying these weights to the components of the travel times and then representing them in a table as times travel that would be experienced by a transit rider as shown in the SSE report Table 2 is misleading and inappropriate. These weights are used within the regional travel forecasting model as part of an overall process of comparing the combination of out-of-pocket costs and travel time for a travelers choice. SSE was very selective in their use of these weights, only applying them to transfer and walk times.

The SSE report does not include all the travel time weights, travel time on a vehicle involving waiting at a traffic signal or delayed in traffic as discussed above, as would be experienced by a BRT vehicle operating along Jones Bridge Road, Wisconsin Avenue and Woodmont Avenue. The report also did not recognize that a traveler riding a transit vehicle along the Master Plan alignment would not encounter any of these more heavily weighted "in-vehicle travel time delays" because the Master Plan alignment avoids and minimizes these delays. Also, surveys of travel behavior, including ones for the DC area, show that there is a preference for modes of travel on guideways over non-guideway (street) modes. This preference is reflected in the travel forecasting process as "perceived attributes" beyond just the travel time and out-of-pocket costs that guideway transit modes have over in-street modes, such as reliability and ride quality and comfort, that come from operating in an exclusive guideway environment as opposed to an in-street operating environment. These mode specific attributes are represented in travel forecasting process by the mode specific constant, expressed as travel time saving.

In the case of a LRT or BRT on a guideway such as along the Master Plan alignment versus a largely mixed traffic BRT or bus, the guideway mode can have a perceived travel time saving benefit of 6 to 12 minutes over the in-street or mixed traffic mode. The SSE analysis does not include either the "in-vehicle travel time delay" weighting or the guideway mode specific constant travel saving benefit in their table. The numbers in the table use an incorrect and inappropriate method for showing travel times and ignore and/or leave out a number of other weights that would not support the assertions drawn from the table results. Using a Jones Bridge Road station east of Rockville Pike would lengthen the total perceived trip time for those accessing the NIH complex. Also – the

main entrance for public access to the NIH facility is located near the Red Line Metro station thereby adding additional delay associated with accessing the gate at that location.

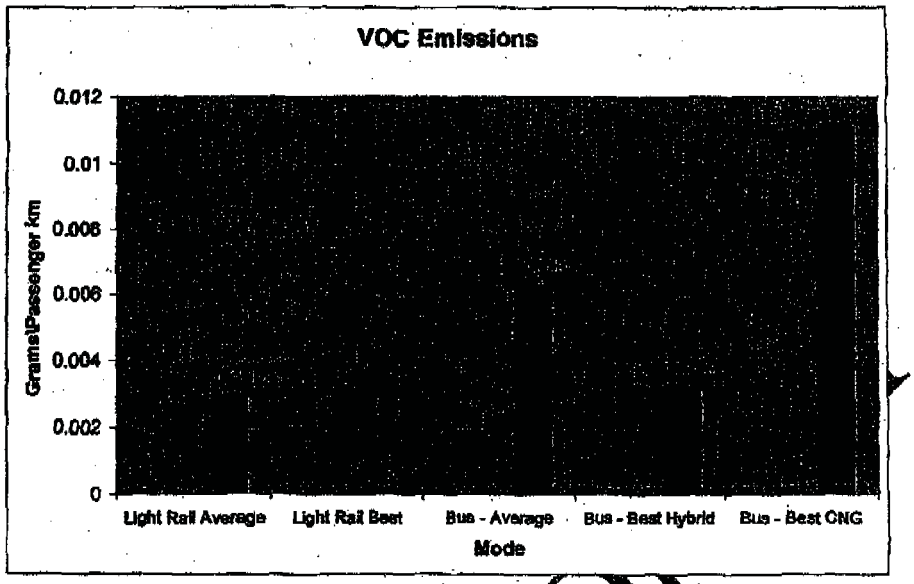
Emissions Analysis

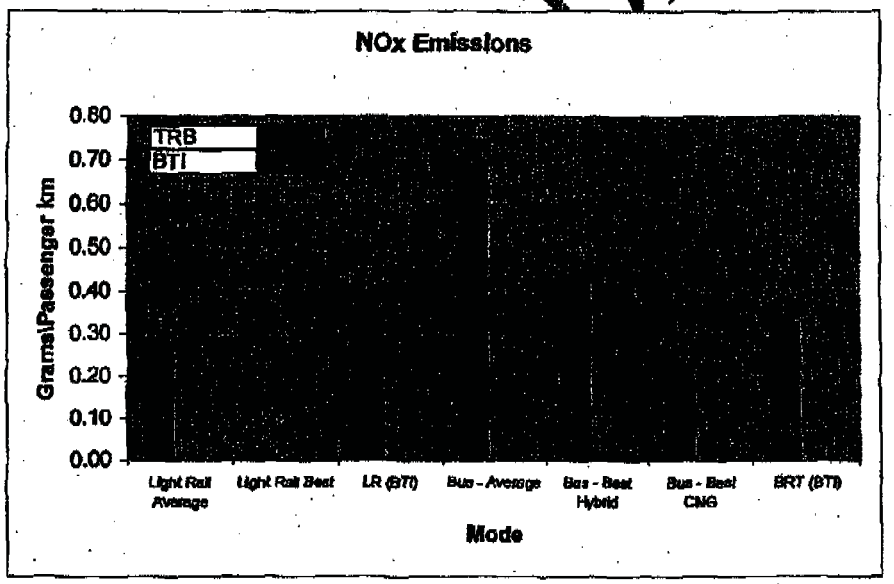
SSE uses as a source (*The Electric Rail Dilemma: Clean Transportation from Dirty Electricity*) for its emissions analysis a report issued by an advocacy group - The Bus Rapid Transit Policy Center. As a public agency, the MTA instead relies on findings from established and accepted research sources from within the transportation industry.

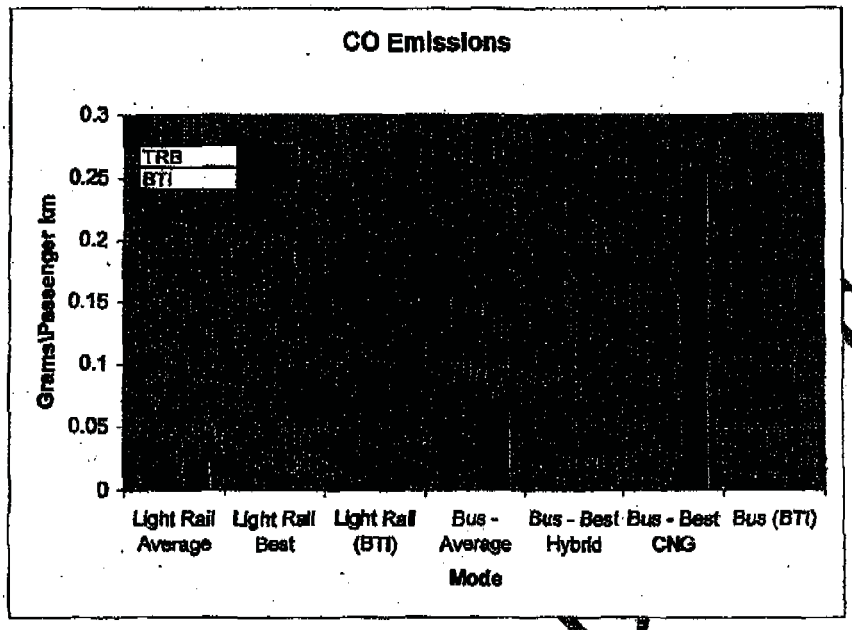
The Transportation Research Board published a report (*Comparison of Emissions from Light Rail Transit and Bus Rapid Transit*) that sought a balanced approach to comparing the resulting emissions from the two transit options. The Transportation Research Record article identified that the BRT Policy Center report contained a few methodology errors which included:

1. "Very clean buses with high occupancy were compared against moderate rail systems from relatively dirty sources."
2. "Very good examples of BRT technology are compared to average or poor examples of electric rail technology."
3. Balanced comparison of the entire generation/refinement and power/fuel delivery process was not completed.

The TRB paper analyzed comparative emissions for NoX, VOC and CO. Results were presented in grams of pollutants per passenger mile which allowed for a direct comparison with the information presented in the report referenced in the SSE report. The results of the analysis for these pollutants are presented in the following graphs. Information presented by SSE is included in blue/green for comparison.


VOC Emissions
0.012
0.01
0.008
0.006
0.004
0.002
0
Grams/Passenger km
Light Rail Average
Light Rail Best
Bus - Average
Bus - Best Hybrid
Bus - Best CNG
Mode


NOx Emissions
0.80
0.70
0.60
0.50
0.40
0.30
0.20
0.10
0.00
TRB
BTI
Grams/Passenger km
Light Rail Average
Light Rail Best
LR (BTI)
Bus - Average
Bus - Best Hybrid
Bus - Best CNG
BRT (BTI)
Mode



The reality from the emissions perspective is that technology used to derive power for both modes continues to be cleaner and build year emissions would expected to be an improvement over what is shown here for whatever mode is selected. This is analysis of expected conditions in future years. Alternatives that provide the highest number of transit trips would then provide the greatest benefit to the region.

The real potential benefit to emissions from the construction of the Purple Line – for either mode – is contained in the potential for creating mixed use communities at appropriate station locations that both provide for basic needs (grocery, retail, etc.) at station locations and enable direct connections to employment/retail/government/restaurant centers along the corridor. This land use and transportation improvement would provide significant auto travel reductions over peripheral auto-oriented development.

Tail Track

Operation

SSE has represented (in a graphic of its creation) the conditions near Woodmont East showing varying fence treatments and asserts that the presence of transit vehicles in this area is inconsistent with planning initiatives. The representation of the operation in this area and the claim of plan inconsistency are both incorrect. SSE further asserts that the eventual transit operator will need to use the tail tracks extensively. It is suggested by

SSE that the tail tracks will be used to store cars during low traffic periods in preparation for peak traffic periods thereby raising the need for fencing the tail track area for safety.

For the Purple Line light rail alternatives, the primary purpose of the tail track is to provide the transit agencies the capability to manage operational disruptions due to a transit vehicle being taken out of service (for a maintenance issue) or delayed during normal hours of operation. A tail track between the Apex Building and Woodmont Avenue is necessary to allow the transit agency to temporarily park a train/vehicle that may need to be taken out of service. Vehicles taken out of service will be removed from the tail track and taken to the maintenance facility (at Lyttonsville) as soon as operationally possible.

It is important to note that no switching to another track would take place at the tail track. A crossover for light rail vehicles to switch to the track in the opposite direction when returning eastbound after arriving at the station from the westbound direction, and visa-versa, would be located east of Pearl Street well before the tail track. For example, if a train is located on one of the tail tracks, it would continue along that same track until it reaches Pearl Street where the train could then switch to the track in the other direction. After the mode is selected for the Purple Line a more detailed assessment will be made to determine whether or not a tail track is required and use of the tail track would be defined in more detail. Tail track operations would be much different under the bus rapid transit (BRT) alternatives. For BRT, in the westbound direction the BRT vehicles would leave the Master Plan right-of-way at Pearl Street and travel on existing roadways to access the current Bethesda station. After serving the current Bethesda station, the BRT vehicles would travel south to Woodmont Avenue and enter the right-of-way operating along the tail track's alignment (without the actual tracks being in place) in the eastbound direction. The BRT vehicles would then stop at the new Purple Line station to load/unload passengers and continue eastbound towards Silver Spring.

Development

As for the findings of planning recommendations - the plan that the Planning Board approved for this area accommodates a Woodmont East project before and after the Purple Line (that is in two phases. The MTA has coordinated with the Woodmont East Developer (JBG), Montgomery County, and the M-NCPPC to ensure that the proposed development and the plans for the Purple Line alignment that use the Master Plan alignment are consistent and compatible. Therefore, it is an incorrect assumption that the plans for use of the Master Plan alignment in this area are inconsistent with approved development plans. The fence (of variable construct in SSE presentations) noted in SSE graphics has never been part of MTA plans.

Renderings

The graphics below depicts a more accurate concept of what is envisioned for the Woodmont East Plaza site both by the current developer (prior to the Purple Line) and through an alternative concept developed by the MTA once the Purple Line is built. It is

important to note that the light rail vehicle would only be in the plaza when maintenance issues require its use as storage until the vehicle can be removed and transported to the Lyttonsville maintenance yard.

Source: MTA

Source: JBG

Impacts to Trees Along the Master Plan Alignment

SSE uses a dated tree survey to describe potential impacts to trees along the Master Plan alignment – a condition that has certainly been changed through the natural cycle of a

trees lifespan. SSE also has created graphics depicting tree removal to support this point. In order to support their claim, SSE exaggerated the potential impact by showing tree removal outside of the right-of-way or area of need for the transitway that would not be necessary.

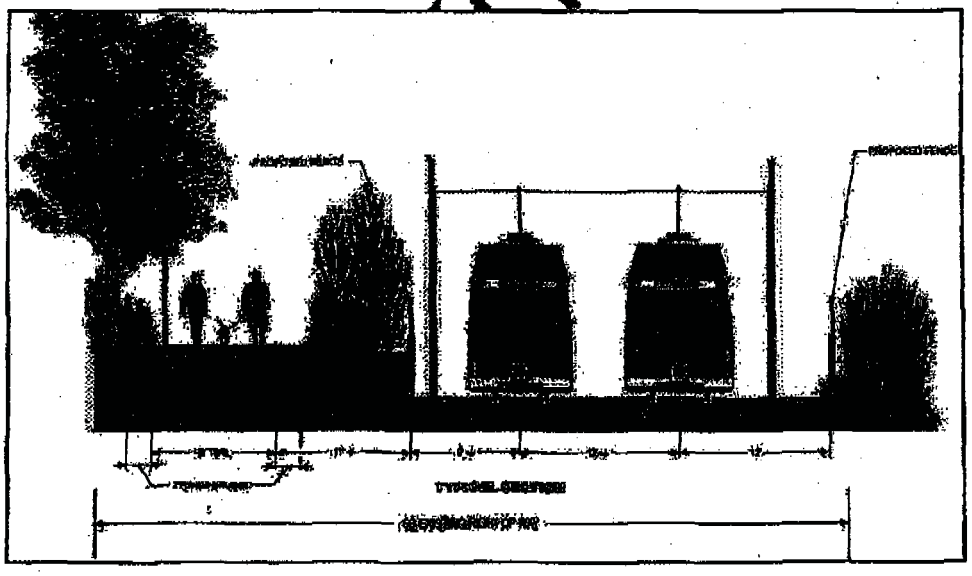
Further, it should be pointed out that there are trade offs between impacts to trees within a right-of-way purchased and specifically reserved for transportation, as compared to those traveler impacts for those that live along Jones Bridge Road.

Also SSE has identified that storm water run-off would increase in this area due to Purple Line construction. Stormwater management is an important element of all transportation projects – design alternatives forwarded to date, including grassy areas along light rail alternatives, have been developed to address stormwater issues.

Trail Design

SSE, in a memo given to the Chevy Chase Town Council on April 22, 2008, titled "Response to Drawings Provided by Maryland Department of Transportation, Secretary's Office, March 11, 2008" outlined some misperceptions about the trail design. The specifics of SSE's criticisms will not be spelled out here but can be summarized as the MTA design is not possible and does not take into consideration all factors.

Figure 5 – Revised typical section for the Purple Line along the Master Plan alignment



The typical section that was included in the memo and analyzed by SSE was never intended to be exactly to scale. The 10'+/- trail has since been clarified to 10' trail with 2' shoulders on either side. This is the Maryland-National Capital Park and Planning's

standard. The 2' shoulder is planned to be an unobstructed area and included in the 11'+/- length segment of the typical. The 11'+/- is intended to be a planted and landscaped buffer area. As stated in previous MTA documents, this is the typical where "feasible". This means that the 10' wide trail with 2' shoulders on both sides will be the standard along the length of the CCT. The trail will never be less than the 10 foot width specified.

The variable dimension will be the 11' between the retaining wall and the edge of the trail closest to the transitway. This width will vary as the horizontal and vertical alignments for both the trail and the transitway are optimized for the width of the ROW, the geometrical constraints of the transitway, the aesthetics of the users, and construction costs. The 11' dimension is the goal of the design.

There aren't any dimensions given from the ROW line to the dimensioned typical. The typical section "floats" within the ROW of way to take advantage of the variations in topography. In some areas, the transitway or trail may be closer to one side of the ROW and closer to the other side in others. This typical section is also valid all along the length of the Master Plan right of way from Pearl Street to Jones Bridge Road with the exception of the ROW dimension. The ROW varies from 66' to 100' in width. The table below identifies the specific width from each segment connecting Connecticut Avenue with Bethesda.

Table 1 - Trail Design Specifics - Woodmont Avenue to Connecticut Avenue

BEGINNING STATION	ENDING STATION	LOCATION	AVAILABLE PLANTING WIDTH (FT)	DISTANCE AT THIS PLANTING WIDTH (FT)	ROW WIDTH (FT)
300+00	302+80	Woodmont Ave to beginning of tunnel - trail not adjacent to track	0	280	66
302+80	313+50	within tunnel - trail is aerial structure when within tunnel	0	1070	32
313+50	315+00	edge of tunnel to Pearl St - trail is aerial structure	0	150	49
315+00	330+00	Pearl St to 500' west of MD 410	0	1500	66
330+00	333+00	500' west of MD 410 to 200' west of MD410	0-10	300	66
333+00	338+00	Vicinity of MD 410 East West Hwy	10-11	500	66
338+00	348+00	300' west of Sleaford Rd crossing to 700' west of Sleaford Rd crossing	9	1000	66
348+00	349+00	200' west of the Columbia Country Club to the beginning of the Country Club	12	100	100
349+00	371+00	Along the Country Club property to 200' west of Connecticut Ave.	12	2200	100
371+00	379+00	aerial structure for station	N/A	600	
379+00	402+00	500' east of Connecticut Ave to 900' west of Jones Mill Rd	12	2300	100
402+00	408+00	overhead pedestrian crossing structure	N/A	600	100

The SSE memo indicated that there will be steep retaining walls per the 1996 plans. The 1996 plans had the trail on the south side of the transitway. In February 2007, the trail was moved to the north side of the transitway to take advantage of the variations in topography. This significantly reduced the amount of retaining walls from the 1996 plans. Contrary to what was stated in the memo, the cost of the retaining walls has been included in the project's cost estimate as a separate line item.

The SSE memo is correct that the impacts to the north side stream are not shown. The Purple Line is currently at the alternatives analysis level of design which is roughly a 10% level of completion. The specific design details for streams, culverts, and stormwater management are addressed at a later stage of design. The SSE memo states that there will be negative effects to the water. By state law, the final design must address water quality issues.

Conclusions

SSE, though use of methods inconsistent with best practice, through analysis that is incorrect, or through over exaggeration of expected conditions has presented information

that is inconsistent with the analysis presented to date by the MTA for this planning study. This effort has been made to over-emphasize the possibilities and benefits of the Jones Bridge Road alignment. SSE's conclusions in general call for transferring the impacts of building in a designated transportation corridor (the master plan alignment) to the users and residents of the Jones Bridge Road community.

SSE also de-emphasizes the dominant travel market in the study area – downtown Bethesda – and the superior travel times afforded through travel on the master plan alignment. Travel times to Bethesda and the surrounding communities are superior through utilization of the master plan alignment and of comparable time to the NIH/NNMC complex by transfer to the Red Line.

The MTA is engaged in an open process which is federally monitored and recognized as the most stringent in all of transportation planning. SSE's assertions have been an attempt to divert attention from the facts stated plainly in all documents issued by MTA to date.

Exhibit 8

Walter Scott, Public Comment on the Intercounty Connector (ICC) Draft Environmental Impact Statement (DEIS), Transportation Pitfalls of the ICC: A Review of the Travel Analysis Technical Report

February 25, 2005

Public Comment on the Intercounty Connector (ICC)
Draft Environmental Impact Statement (DEIS)

Transportation Pitfalls of the ICC: A Review of the Travel Analysis Technical Report

Walter Scott
February 25, 2005

The author was one of the principal researchers for the original Balanced Land Use plan that was modeled by the Montgomery County Park and Planning staff for the Transportation Policy Report, and has been used as the basis for subsequent studies. In his day job he is a Principal Technologist at Fannie Mae in Washington, DC.

The alleged purpose and need of the ICC, as stated in the DEIS, is to promote transportation accessibility in the region by linking the I-270 and I-95 corridors. What the DEIS does not point out is that:

- The demand for travel between the two corridors is exceedingly small – about 1% of AM peak hour trips either beginning or ending in either Montgomery or Prince George's County.
- Instead, the vast majority (90%+) of AM peak hour trips in Montgomery County tend to be either local, or primarily *radial* in character (north-south), and would have no reason to use the ICC at all.
- Furthermore, it turns out that building the ICC would, as a side effect, significantly *increase* traffic congestion on many of the major north-south facilities that many commuters actually use, such as I-270, Georgia Avenue, Connecticut Avenue, and Layhill Road.
- Adding insult to injury, the ICC would also increase traffic on the Beltway! This result is just the opposite of what ICC proponents have tried to suggest.

In short, the ICC does a rather poor job of addressing the real transportation needs within the study area. A tiny proportion of commuters would realize its full benefits, a somewhat larger group would get a small benefit, and the vast majority would see no benefit or even a degradation in traffic congestion. This in turn must be compared with the ICC's substantial fiscal, environmental, and other adverse impacts.

The rest of this paper explains these adverse findings in detail, using data taken directly from the DEIS and from supplemental origin-destination data from the ICC study, supplied by the Maryland State Highway Administration.

1. **The ICC has a negligible *or even adverse* effect on traffic conditions on I-270, I-95 and the Capital Beltway.**

These three highways are by far the most heavily utilized roadways within the ICC study area and within Montgomery County. Advocates for the ICC have often implied that the ICC would benefit traffic congestion on these highways, especially on the Beltway. Such an implication has absolutely no basis in fact. The 1997 DEIS showed that the ICC would have no substantial impact on freeway traffic volumes, and the new DEIS confirms this result:

"As expected, the construction of the ICC, under any Build Alternative, would have a negligible impact on freeway operations in the future. I-270 and I-95 are north-south oriented freeways and therefore demand in the future is not expected to be helped by an ICC. The Capital Beltway is at the lower boundary of the study area and as expected has its own travel market and would not be appreciably impacted by the construction of an ICC." – DEIS, IV-50

Table IV-103 in the DEIS compares the LOS on various freeway segments for AM and PM peak hours. To find the actual traffic volumes (AWDT) that the LOS is based on, it is necessary to dig into the 2000 pages of appendices to the travel report. These contain two conflicting sets of data on freeway traffic. On pages 1096, 1117, and 1137 are 'freeway link summaries' showing traffic on I-270, I-95 and the Beltway. However, on pages 265-261, 591-596, and 734-740 there are link factoring adjustment tables showing AWDT organized by study area intersection or interchange. The figures here for freeway volumes do not always agree with those on the freeway link summaries; however, the arterial traffic volumes from these tables do agree with those in Table IV-96 within the main travel analysis report, and so I have taken these numbers to be definitive. In addition, these tables show data for freeway segments not listed in the freeway summaries or in the LOS table.

Let's take a look at what these tables have to say about traffic on I-270 in the model year of 2030. For all tables, we will compare the 2030 No Build option with the standard (with tolls, not truncated) Corridor 1 (Master Plan Alignment) and Corridor 2 (Northern Alignment) ICC options:

		No-Build	**C1 / MPA**	**C2 / NA**	*reduction or*	*(increase)*
Freeway	**Segment**	***2030 AWDT, 1000s***			**Corr 1/MPA**	**Corr 2/NA**
I-270	N of I-370	236,200	**250,900**	**249,000**	(14,700)	(12,800)
I-270	I-370 to Shady Grove	204,700	**205,900**	**206,400**	(1,200)	(1,700)
I-270	Shady Grove to MD 28	252,600	247,400	247,300	5,200	5,300
I-270	MD 28 to Falls Rd	258,900	253,400	253,600	5,500	5,300
I-270	Falls to Montrose	230,700	229,200	229,400	1,500	1,300
I-270	Montrose to spurs	257,800	**261,500**	**261,300**	(3,700)	(3,500)
I-270 SW spur	Democracy to I-270	138,200	**147,100**	**146,500**	(8,900)	(8,300)
I-270 SE spur	I-270 to Rockledge	119,700	114,300	114,800	5,400	4,900
I-270 SE spur	Rockledge to MD 187	108,500	**109,200**	**109,700**	(700)	(1,200)
I-270 SE spur	MD 187 to I-495	133,300	**134,200**	**133,700**	(900)	(400)
	I-270 segment avg	240,150	**241,383**	**241,167**	(1,233)	(1,017)
	I-270 spurs avg	124,925	**126,200**	**126,175**	(1,275)	(1,250)

The data shows that both alignments of the ICC substantially *increase* traffic on I-270 north of the ICC (I-370) interchange, and on the southwest spur heading towards Northern Virginia. At the same time, there is a reduction in traffic between the Shady Grove interchange and the Rockledge interchange on the southest spur. The overall effect on I-270 and its spurs is a slight *increase* in traffic.

Now let's look at projected traffic volumes on the Beltway:

		No-Build	**MPA**	**NA**	*reduction or*	*(increase)*
Freeway	**Segment**	***2030 AWDT***			**Corr 1/MPA**	**Corr 2/NA**
I-495	I-270 spur to MD 355	270,200	**271,900**	**271,100**	(1,700)	(900)
I-495	MD 355 to Conn Ave	239,700	**249,500**	**255,200**	(9,800)	(15,500)
I-495	Conn Ave to Ga Ave	255,900	**257,900**	**258,000**	(2,000)	(2,100)
I-495	Ga Ave to US 29	256,500	**260,400**	**264,300**	(3,900)	(7,800)
I-495	US 29 to Univ Ave	239,800	**240,300**	**243,100**	(500)	(3,300)
I-495	Univ Ave to NH Ave	270,600	**272,500**	**272,700**	(1,900)	(2,100)
I-495	NH Ave to I-95	272,900	267,800	271,800	5,100	1,100
I-495/I-95	I-95 to US 1	275,900	272,700	271,900	3,200	4,000
I-495/I-95	US 1 to BW Pkwy	241,400	**243,600**	**241,400**	(2,200)	-
	Beltway segment avg	258,100	**259,622**	**261,056**	(1,522)	(2,956)

The impact of the ICC on Beltway traffic is decidedly negative: seven out of nine segments show no effect or an increase in traffic with either ICC alignment, and average study area Beltway traffic increases. The worst impact occurs on one of the most dangerous segments of the Beltway, between MD 355 and Connecticut Avenue, where the increase is from 4-7% depending on alignment.

It's important to realize that the DEIS study did not take into account any increases in jobs and/or housing due to the ICC – it used the same forecasts, and thus the same productions and attractions (P/A), for both the 2030 No-Build and the ICC options. If this had been correctly modeled, the traffic volumes under the ICC would be even greater.

Here are the traffic volumes for I-95:

		No-Build	***MPA***	***NA***	*reduction or*	*(increase)*
Freeway	**Segment**				**Corr 1/MPA**	**Corr 2/NA**
I-95	N of MD 198	228,400	**228,700**	**228,700**	(300)	(300)
I-95	MD 198 to Contee Rd	236,200	**246,100**	210,800	(9,900)	25,400
I-95	Contee Rd to ICC	245,400	**252,100**	219,000	(6,700)	26,400
I-95	ICC to MD 212	245,400	237,800	**246,400**	7,600	(1,000)
I-95	MD 212 to I-495	215,500	208,500	209,900	7,000	5,600
	I-95 segment average	234,180	**234,640**	222,960	(460)	11,220

The Master Plan Alignment of the ICC tends to increase I-95 traffic north of the ICC interchange and decrease traffic south of the interchange. The Northern Alignment decreases traffic on I-95 between the ICC and MD 198 but increases it elsewhere.

2. **The ICC has an *adverse* affect on traffic volumes on most of the major North-South arterial roads that traverse the study area.**

Despite the focus of the ICC study on east-west traffic, the predominant travel direction in the study area, especially for commuting trips, is north-south. Unlike the 1997 DEIS, the current study did not employ a formal north-south screenline at the Beltway; but we can derive such volumes from the same link tables (pages 265-261, 591-596, and 734-740) where we unearthed the freeway data.

Here, for example, are daily projected traffic volumes across a screenline running just north of the Beltway:

Facility	Segment	2030 No-Build
I-270	N of spurs	257,800
Conn Ave	N of Beltway	60,600
Georgia Ave	N of Beltway	75,700
MD 355	N of Beltway	76,100
New Hamp	N of Beltway	65,400
US 29	N of Beltway	71,100
I-95	N of Beltway	215,500
US 1	N of Beltway	56,700
	Arterials subtotal	405,600
	Total	878,900

For comparison, here are the projected volumes for the ICC itself:

Segment	MPA	NA
I-370 to Georgia	96,400	89,200
Georgia to Layhill	63,000	50,100
Layhill to New Hamp	63,100	70,400
New Hamp to US 29	66,600	48,200
US 29 to Briggs Chaney	85,800	
Briggs Ch to A-59/Konterra	92,000	
A-59/Konterra to I-95	77,200	
US 29 to Contee Rd		48,700
Contee Rd to I-95		41,800
I-95 to Va Manor	40,500	31,600
Va Manor to US 1	30,100	15,800

The volume of traffic traversing the north south arterials (not even counting I-270 and I-95) is several times that of the ICC even at its busiest segments. The point is that we should be very concerned about any impacts on these arterials from the ICC, if we care about the *general* level of traffic congestion within the study area. And what we find from investigating the arterial volumes (from table IV-96, along with the appendix link tables), is that traffic levels on most of these arterials actually gets *worse* with the ICC, compared to the no-build alternative.

The greatest adverse traffic impact, in percentage terms, is on Georgia Ave. (MD 97). With both ICC alignments there is a large (~25%) traffic increase on Georgia just south of its interchange with the ICC:

	2030 AWDT			*reduction or (increase)*	
Segment	**No-Build**	**MPA**	**NA**	**Corr 1/MPA**	**Corr 2/NA**
N of MD 108	21,900	21,400	20,800	500	1,100
S of MD 108	36,000	35,600	34,100	400	1,900
ICC to Norbeck	43,000	**54,300**	**53,600**	(11,300)	(10,600)
S of Norbeck	50,800	**56,700**	**58,700**	(5,900)	(7,900)
N of Bel Pre	53,200	**58,300**	**59,200**	(5,100)	(6,000)
S of Bel Pre	54,100	53,200	**56,700**	900	(2,600)
N of Randolph	48,400	**56,700**	**50,700**	(8,300)	(2,300)
S of Randolph	55,300	**59,100**	**56,700**	(3,800)	(1,400)
N of Beltway	75,700	**77,800**	**79,400**	(2,100)	(3,700)
S of Beltway	100,600	96,600	98,300	4,000	2,300
Ga Ave segment avg	53,900	**56,970**	**56,820**	(3,070)	(2,920)

The reason for this increase is similar to the reason why traffic levels on these arterials jump substantially just south of the Beltway (e.g. Connecticut Avenue). Commuters would use the ICC for just part of its length, and then proceed onto an arterial such as Georgia (headed south) to continue their trip. These travellers may experience only a minor improvement in their overall commute time because of the back-up on Georgia. Meanwhile, people travelling on Georgia but not the ICC, such as residents of Olney commuting to Silver Spring, would see their commute times actually increase due to the ICC.

Similar adverse effects can be seen on the nearby arterials, Connecticut Ave (MD 185) and Layhill Rd (MD 182).

Connecticut Ave	***2030 AWDT***			*reduction or (increase)*	
Segment	**No-Build**	**MPA**	**NA**	**Corr 1/MPA**	**Corr 2/NA**
N of Randolph	42,900	**51,100**	**45,200**	(8,200)	(2,300)
S of Randolph	48,500	**52,300**	**49,900**	(3,800)	(1,400)
N of Beltway	60,600	57,800	58,600	2,800	2,000
S of Beltway	64,700	**68,100**	**68,400**	(3,400)	(3,700)
Conn Ave segment avg	54,175	**57,325**	**55,525**	(3,150)	(1,350)

Layhill Rd	***2030 AWDT***			*reduction or (increase)*	
Segment	**No-Build**	**MPA**	**NA**	**Corr 1/MPA**	**Corr 2/NA**
N of Norbeck	18,700	17,400	17,600	1,300	1,100
S of Norbeck [N of MPA]	11,500	10,900	**14,800**	600	(3,300)
N of Bel Pre [S of MPA]	23,100	**28,200**	**28,900**	(5,100)	(5,800)
S of Bel Pre/Bonifant	26,400	**28,200**	**30,400**	(1,800)	(4,000)
Layhill segment avg	19,925	**21,175**	**22,925**	(1,250)	(3,000)

There are similarly alarming effects on New Hampshire Ave (MD 65) traffic, especially under the Northern Alignment (corridor 2):

New Hampshire Ave Segment	2030 AWDT No-Build	MPA	NA	reduction or (increase) Corr 1/MPA	Corr 2/NA
N of MD 108	13,900	13,900	12,900	-	1,000
MD 108 to Ednor	18,700	18,700	**19,500**	-	(800)
Ednor to MD 28/198/NA	19,800	18,400	**42,900**	1,400	(23,100)
S of MD 28/198/NA	28,300	22,100	**36,700**	6,200	(8,400)
N of Norwood/Brgs Ch	25,800	22,100	**36,700**	3,700	(10,900)
S of Norwood/Brgs Ch	30,600	26,900	**35,600**	3,700	(5,000)
N of Bon/Gd Hope	29,900	**32,900**	**33,500**	(3,000)	(3,600)
S of Bon [N of MPA]	40,800	39,600	**42,900**	1,200	(2,100)
N of Randolph [S of MPA]	44,400	**52,600**	**46,600**	(8,200)	(2,200)
S of Randolph	49,100	**52,800**	**50,400**	(3,700)	(1,300)
N of I-495	65,400	65,100	61,800	300	3,600
S of I-495	56,300	**56,500**	**57,400**	(200)	(1,100)
NH segment average	35,250	35,133	39,742	117	(4,492)

Under the MPA, we see the characteristic jump in traffic volumes just south of the ICC interchange (a 20% increase). However, this is offset by a reduction in traffic between MD 198 and the MPA interchange. But under the NA, where the ICC meets New Hampshire Ave close to MD 198 itself, we see a very different traffic pattern. Volumes between Ednor Rd and the ICC interchange more than double (!), and the entire road is more congested all the way from MD 108 to somewhere south of Randolph Rd.

Conversely, US 29 fares worse under the MPA, with substantial (10%) traffic increases around the ICC interchange, so that overall traffic within the study area is increased; under the NA the effect is mixed:

US 29 Segment	2030 AWDT No-Build	MPA	NA	reduction or (increase) Corr 1/MPA	Corr 2/NA
N of NA	-	-	85,000	-	-
N of MD 198 [S of NA]	84,800	84,900	72,000	(100)	12,800
S of MD 198	66,700	69,400	59,700	(2,700)	7,000
N of Briggs Chaney	71,100	69,900	71,400	1,200	(300)
S of Briggs Ch [N of MPA]	71,200	77,200	74,100	(6,000)	(2,900)
N of Fairland [S of MPA]	71,200	78,400	74,100	(7,200)	(2,900)
Fairland to Randolph/CH	80,900	81,200	77,200	(300)	3,700
S of Randolph/Cherry Hill	72,800	70,100	70,600	2,700	2,200
N of I-495	71,100	74,500	73,500	(3,400)	(2,400)
S of I-495	69,700	67,700	66,900	2,000	2,800
US 29 segment avg	73,278	74,811	72,450	(1,533)	828

MD 355 (Rockville Pike / Hungerford / Frederick / etc) fares a little better. Of the segments published in the DEIS, we see higher traffic north of Shady Grove (due to people getting on/off the ICC interchange), but reductions south of there (probably because fewer trips are feeding into MD 28).

MD 355	***2030 AWDT***			*reduction or*	*(increase)*
Segment	**No-Build**	**MPA**	**NA**	**Corr 1/MPA**	**Corr 2/NA**
N of I-370	53,700	**56,900**	**56,500**	(3,200)	(2,800)
I-370 to Shady Grove	53,200	**53,500**	**53,600**	(300)	(400)
S of Shady Grove	58,600	57,400	57,400	1,200	1,200
N of Redland	61,000	55,100	55,300	5,900	5,700
S of Redland	60,700	55,900	56,500	4,800	4,200
N of I-495	76,100	74,700	74,200	1,400	1,900
S of I-495	72,600	70,000	70,200	2,600	2,400
MD 355 segment avg	62,271	60,500	60,529	1,771	1,743

US 1 fares the best of the arterials, showing an overall traffic reduction of about 4%:

US 1	***2030 AWDT***			*reduction or*	*(increase)*
Segment	**No-Build**	**MPA**	**NA**	**Corr 1/MPA**	**Corr 2/NA**
N of MD 198	46,100	45,600	43,500	500	2,600
S of MD 198	63,000	62,100	59,200	900	3,800
N of Contee	40,500	**41,900**	37,100	(1,400)	3,400
S of Contee [N of ICC]	40,200	39,900	36,400	300	3,800
N of Muirkirk [S of ICC]	40,200	39,000	**40,300**	1,200	(100)
Muirkirk to Ritz Way	37,300	30,500	33,500	6,800	3,800
S of Ritz Way	42,000	37,400	40,900	4,600	1,100
N of Powder Mill	45,700	41,500	44,500	4,200	1,200
Powder Mill to I-95	56,700	54,500	55,000	2,200	1,700
S of I-95	88,000	**88,600**	**88,600**	(600)	(600)
US 1 segment average	49,970	48,100	47,900	1,870	2,070

And here is a summary of all of the freeways & arterials we have examined:

Arterial/Freeway	***2030 AWDT***			*reduction or*	*(increase)*
Segment Averages	**No-Build**	**MPA**	**NA**	**Corr 1/MPA**	**Corr 2/NA**
I-270	240,150	**241,383**	**241,167**	(1,233)	(1,017)
MD 355	62,271	60,500	60,529	1,771	1,743
Conn Ave (MD 185)	54,175	**57,325**	**55,525**	(3,150)	(1,350)
Georgia Ave (MD 97)	53,900	**56,970**	**56,820**	(3,070)	(2,920)
Layhill Rd (MD 182)	19,925	**21,175**	**22,925**	(1,250)	(3,000)
New Hamp Ave (MD 650)	35,250	35,133	**39,742**	117	(4,492)
US 29	73,278	**74,811**	72,450	(1,533)	828
US 1	49,970	48,100	47,900	1,870	2,070
I-95	234,180	**234,640**	222,960	(460)	11,220
Beltway	258,100	**259,622**	**261,056**	(1,522)	(2,956)

3. **Trips that would benefit from the ICC represent a relatively small proportion of the total trips originating or ending in the Study Area.**

Table IV-92 in the DEIS shows the changes in travel times between various points within the study area. The points chosen fall roughly into three groups:

a. *I-270 corridor*: Gaithersburg, Rockville, and Shady Grove
b. *Residential wedge*: Olney, Colesville, Glenmont, White Oak
c. *I-95 corridor*: BWI, Konterra, Laurel, College Park

Looking at the table in isolation, you would get a very skewed view of the overall impact of the ICC on travel times. This is because the number of trips between the I-270 and I-95 corridors, or even between the residential wedge and either corridor, is fairly small compared to the trips going to other destinations, such as to DC and other points inside the Beltway.

Unfortunately, there is no way to corroborate this using data in the DEIS itself, because the trip volumes (Origin-Destination matrix) between the various traffic zones are not included. I am indebted to Pam Lindstrom, who requested a copy of the O-D matrix from the ICC study office and, with some difficulty, was able to get this data translated into a readable form. The O-D matrices supplied is for the 2030 MPA, for the AM peak hour trips. For simplicity, I worked with just the first matrix supplied, representing 'mode 1', or auto trips. This matrix is 2171 x 2171 (MWCOG traffic zone level); I condensed it into a 73 x 73 matrix in which each row or column represents either a Montgomery County Policy Area, or a part of Prince George's County, or some other county within the MWCOG traffic model. The matrix and its derivation are available from the author in Microsoft Excel format upon request.

Using this reduced matrix, we can get a sense of how many 2030 AM peak hour trips from a given policy area or region, such as Olney or Rockville, would go to some other area, compared to the total. Furthermore, using the travel time matrix and simple geographic analysis, we can characterize the trips by whether they are likely to benefit from the ICC by making use of all, most, or part (less than half) of its length. We define the trip length in terms of corridors or stream valleys. The study area can be roughly grouped into four parts:

d. The I-270 corridor, or everything to the west of Rock Creek,
e. The 'Georgia Ave corridor', meaning the part of the eastern residential wedge between Rock Creek and Northwest Branch,
f. The 'US 29 corridor', from Northwest Branch to the county line, and
g. The I-95 corridor, meaning all of Prince George's County to the northwest of I-295 / Balt-Wash Parkway

Trips that could use the ICC to traverse between adjacent corridors will only follow the ICC for a short distance, less than half of its length. These are labeled as using 'part' of the ICC. Trips traversing three out of the four corridors will use half or more

of the ICC and are labeled as using 'most' of the roadway. Finally, trips going all the way between the I-270 and I-95 corridors (or beyond) are designated as using 'all' of the ICC (although they may in fact not use the segment from I-95 to US 1).

Let's use Gaithersburg as an example. According to table IV-92, Gaithersburg, as both an origin (home) or destination (work place), stands to benefit the most from the ICC out of all the locations listed; all of the trips in the table between it and points in the Residential Wedge or in the I-95 corridor show a significant reduction in travel times.

Here is a breakdown of all the 2030 AM peak hour trips (with the ICC MPA as part of the road network) in which Gaithersburg is the trip origin:

2030 MPA, AM Peak Hour Auto Trips
Originating in Gaithersburg

Destination	**Trips**	**%**
Gaithersburg	19254	51.9
I-270 corr, radial	12784	34.4
Mont Co, other (non ICC)	1063	2.9
Res wedge (part ICC)	369	1.0
Res wedge (most ICC)	235	0.6
I-95 and beyond (full ICC)	977	2.6
DC, NoVa, etc (non ICC)	2428	6.5
Total	37110	100.0

About half of the trips originating in Gaithersburg also end in Gaithersburg. This is not terribly surprising – Gaithersburg is a major job center, and a number of its residents can therefore commute to work locally (e.g. to NIST). They do not need to use the ICC. Of the remaining trips, most are within the I-270 corridor (Bethesda to Clarksburg), and are primarily radial in nature (north-south). 6.5% of trips go to points outside Montgomery County, such as Fairfax County, for which the ICC is not useful. Only about 1600 trips, or 4% of the total, go to destinations in the residential wedge, the I-95 corridor, or beyond (PG, Howard, or Anne Arundel County, for example), that would have reason to use the ICC. Only 2.6% of trips would have reason to use the full length of the highway.

So 96% of Gaithersburg residents would see no benefit in their morning commute from the ICC! In fact, some would see a degradation of traffic due to the increased volume of feeder traffic near the ICC terminus (such as we saw on MD 355).

Now, as Gaithersburg is a major employment center, we should also look at AM trips that end there as well. Perhaps there are many people who work in Gaithersburg (but do not live there) who will benefit from the ICC. Here are the numbers:

2030 MPA, AM Peak Hour Auto Trips
Ending in Gaithersburg

Origin	**Trips**	**%**
Gaithersburg	19254	45.2
I-270 corr, radial	15106	35.5
Mont Co. other (non ICC)	2953	6.9
Res wedge (part ICC)	356	0.8
Res wedge (most ICC)	461	1.1
I-95 and beyond (full ICC)	2070	4.9
DC, NoVa, etc (non ICC)	2359	5.5
Total	42559	100.0

We see that a little under 3000 trips, or about 7% of the total going to Gaithersburg, could make use of the ICC. This is more than the trips originating in Gaithersburg, but it is still a very small fraction of the whole. Put another way, 93% of commutes into Gaithersburg would have no reason to use the ICC.

We can see that Gaithersburg is quite representative of the entire I-270 corridor. When we combine results for the entire corridor (from Bethesda through Clarksburg) we also see 4% of trips originating in the corridor, and 7% of trips ending in the corridor, potentially using the ICC:

I-270 Corridor	**Originate in Corridor**		**End in Corridor**	
2030 AM Peak Hr		**%**		**%**
Total	269,054	100.0	279,612	100.0
Uses all of ICC	3,175	1.2	4,226	1.5
Uses most of ICC	2,611	1.0	4,980	1.8
Uses part of ICC	5,788	2.2	12,561	4.5
Local	114,997	42.7	83,082	29.7
Within corridor	83,778	31.1	114,997	41.1
Other (non ICC)	58,705	21.8	59,766	21.4

Working from the other end of the ICC, we can examine trips going to and from Laurel, which lies along US 1 a few miles north of where the eastern terminus of the ICC would be.

2030 MPA, AM Peak Hour Auto Trips
Originating in Laurel

Destination	**Trips**	**%**
Laurel	5313	44.5
I-95 corr, PGC	3183	26.7
MC res wedge (part ICC)	230	1.9
MC res wedge (most ICC)	95	0.8
I-270 corr (full ICC)	240	2.0
No Va (?)	167	1.4
Other (non ICC)	2712	22.7
Total	11940	100.0

2030 MPA, AM Peak Hour Auto Trips
Ending in Laurel

Origin	Trips	%
Laurel	5313	43.9
I-95 corr, PGC	2601	21.5
MC res wedge (part ICC)	358	3.0
MC res wedge (most ICC)	237	2.0
I-270 corr (full ICC)	212	1.8
No Va (?)	78	0.6
Other (non ICC)	3299	27.3
Total	12098	100.0

The city of Laurel proper is not as large as Gaithersburg, so the absolute numbers here are smaller. Also, the I-95 corridor (PGC) is here defined as the section of Prince George's County lying to the west of I-295/BW Parkway. This region is not as large as the I-270 corridor in Montgomery County, so we see a larger proportion of trips going outside the corridor, for example, to other parts of PG County, or to Anne Arundel County. The proportion of trips using the ICC is similar to that of Gaithersburg – only about 5% of trips coming from Laurel, and 7% of trips coming to Laurel. In addition there are a handful of trips (about 1%) going to and from Northern Virginia. These trips might make use of the ICC + I-270 as an alternative to I-495, despite the additional trip length, in cases of extreme congestion (such as when there is an accident on the Beltway).

So it turns out that the communities that lie at either end of the ICC, in the I-270 and I-95 corridors, have relatively little use for the ICC. This is because they are already highly accessible to many potential destinations using the existing road network. The ICC does not greatly increase the overall accessibility of these places because there are so many other possible destinations that are reachable in less than, say, the 37 minutes between Gaithersburg and Laurel achieved with the MPA. This is why we see only 4-7% of trips even potentially using the ICC.

Let's look, then, at a community that does not lie directly within the corridors, but in the eastern residential wedge of Montgomery County, between the corridors – for example, Glenmont. By geography, it is clear that no trip to or from Glenmont will use the entire length of the ICC, but only part of it. Furthermore, we see from the DEIS travel time table that many of the trips between Glenmont and the corridors do not actually benefit from the ICC – including trips to Rockville and College Park. This is because these locations all lie south of the ICC. We have seen that most of the radial routes in the study area become extremely congested just south of the ICC. Therefore, it is of little benefit to try to make a north – east – south or north – west – south detour using the ICC when a more direct route, such as using University Avenue, Randolph Road, or Viers Mill, will achieve the same result.

2030 MPA, AM Peak Hour Auto Trips
Originating in Glenmont

Origin	Trips	%
Glenmont	594	21.4
Radial - Ga Ave	745	26.8
East wedge (part ICC)	144	5.2
I-270 corr (part ICC)	174	6.3
I-95 corr (most ICC)	73	2.6
All other (non ICC)	1046	37.7
Total	2776	100.0

2030 MPA, AM Peak Hour Auto Trips
Ending in Glenmont

Destination	Trips	%
Glenmont	594	30.3
Radial - Ga Ave	691	35.3
East wedge (part ICC)	115	5.9
I-270 corr (part ICC)	104	5.3
I-95 corr (most ICC)	26	1.3
All other (non ICC)	428	21.9
Total	1958	100.0

The proportion of trips using the ICC from a location such as Glenmont is higher (14% as origin, 13% as destination) than in Laurel or Gaithersburg, but nearly all of these trips make use of less than half the length of the ICC, and none use the full length. The corresponding reductions in travel times for such trips are therefore more modest.

This leaves us with the question, what communities see the greatest proportion of trips using the ICC? It turns out that these are precisely the north-eastern residential wedge areas in Montgomery County, generally lying to the north of the ICC and in between the corridors at each end. Specifically, these are the policy areas of Olney, Patuxent, Fairland, and Cloverly [Colesville], along with the eastern 'reserve' areas around Olney. Residents of these areas have the most reason to use the ICC because these areas are not accessible to other major transportation facilities. Therefore, they would make much more use of the ICC than any other part of the study area – about a third of trips originating in this region, and a quarter of trips ending there.

2030 AM Peak Hr	Colesville	Fairland	Olney	E reserve	Patuxent	Total	Percent
Total origins	4,870	20,085	16,719	5,019	2,174	48,867	100.0
Uses most of ICC	1,053	2,385	612	222	446	4,718	9.7
Uses part of ICC	1,121	4,340	5,157	1,835	395	12,848	26.3
Local	1,236	9,506	7,348	1,068	448	19,606	40.1
Other (non ICC)	1,460	3,854	3,602	1,894	885	11,695	23.9

2030 AM Peak Hr	Colesville	Fairland	Olney	E reserve	Patuxent	Total	Percent
Total destinations	2,574	17,489	10,227	2,224	1,958	34,472	100.0
Uses most of ICC	232	1,191	103	45	206	1,777	5.2
Uses part of ICC	562	4,130	1,079	309	357	6,437	18.7
Local	1,236	9,506	7,348	1,068	448	19,606	56.9
Other (non ICC)	544	2,662	1,697	802	947	6,652	19.3

The catch is – this region comprises just a small part of the study area. In the 2030 model, there are about 447,000 AM peak hour trips originating somewhere in Montgomery County, and 424,000 trips ending in the county. So the proportion of all trips beginning or ending in this subregion is just 11% and 8% respectively, compared to the entire county. Another way of saying this, is that only about 10% of Montgomery County jobs or households are in areas where the ICC would have a major impact on transportation options.

More simply, the ICC tends to benefit a few people (1%) quite a lot, some more people (up to 9%) just a little, and a vast majority of people (over 90%) not at all. Here are the totals for all trips either originating or ending in Montgomery County:

2030 AM Peak Hr All Montgomery Cty	Originations	%	Destinations	%
Total	447,112	100.0	424,437	100.0
Uses all of ICC	3,490	0.8	4,531	1.1
Uses most of ICC	9,452	2.1	8,368	2.0
Uses part of ICC	31,046	6.9	28,972	6.8
Local (within plcy area)	177,473	39.7	177,473	41.8
Other (non ICC)	225,651	50.5	205,093	48.3

We see that:

h. over 90% of trips originating or ending in the county would have no reason to use the ICC at all
i. of the trips that might use the ICC, 70% of them would use only a small segment (less than half the length), and only 10%, or 1% of all Montgomery County trips, would travel all the way between the I-270 and I-95 corridors.

Here are the results for all of Prince George's County. Only 2% of trips beginning or ending in the county would use any part of the ICC:

2030 AM Peak Hr All PG County	Originations	%	Destinations	%
Total	393,690	100.0	383,879	100.0
Uses all of ICC	4,585	1.2	3,708	1.0
Uses most of ICC	767	0.2	2,111	0.5
Uses part of ICC	2,348	0.6	3,664	1.0
Non ICC	385,990	98.0	374,396	97.5

4. Conclusion

We can conclude from these figures that the actual demand for the cross corridor trips that are the stated purpose and need of the ICC constitute only 1% of the AM peak hour trips originating or ending in either Montgomery or Prince George's county. The roadway would instead be used much more often for short distances and usually in combination with existing north-south arterials or highways, that themselves would often become more congested as a result.

The real 'purpose and need' that the actual usage of the ICC addresses, is the relative inaccessibility of the wedge communities of Olney and Fairland. There are many ways in which these local problems could be addressed without building a massive cross county facility that would have major financial, environmental, and other adverse impacts. Combined with new transit facilities, the Balanced Land Use plan that I helped develop, that was modeled in the Transportation Policy Reports and more recently in the EDF study of the ICC, can increase accessibility to jobs and households even without new east-west facilities.

By extending transit up to Olney via Georgia Avenue, and through Fairland along US 29, and then linking Silver Spring to the I-95 and I-270 corridors via the Purple Line, large parts of the residential wedge are now linked into the wider transit system. At the same time, we should build on the revitalization of Silver Spring and Wheaton and promote job development up the Georgia Ave and US 29 'corridors' so that there is more of a balance between jobs and housing in these areas.

Finally, if we really want to address the most pressing transportation and accessibility issues in an environmentally friendly way, then we should look to extend transit services within our existing corridors and promote balanced, mixed-use development near the transit centers. First on the list should be an expansion of Metro up to Gaithersburg and eventually to Clarksburg. About 66,000 radial AM trips originating in the upper I-270 corridor could potentially benefit from this – about eight times the potential number of trips between I-270 and I-95.

These are the kind of 21st century solutions that are more appropriate for addressing our transportation problems, than to keep trying to resurrect a 1950's approach of building yet another highway.

Walter Scott
walter_scott@mindspring.com
725 Beall Ave.
Rockville, MD 20850

- RECORD #1187 DETAIL

First Name :	Council Member Stephanie
Last Name :	Stullich
Business Name :	City of College Park
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : My name is Stephanie Stullich, S-T-E-P-H-A-N-I-E, S-T-U-L-L-I-C-H.

Thank you, and I'm very excited to be here tonight to be able to testify in support of the purple line. I'm very excited that you are at this point in the process of bringing the purple line to Prince George's and Montgomery County.

I believe it is one of the most important things that we can do to invest in the future of our two counties and also to invest in a greener and more environmentally sound future for our metropolitan region.

As an elected official, one of the most popular things that I can do in fact is to be a strong supporter for the purple line. I haven't met a single one of my constituents in College Park who isn't strongly in favor of the purple line.

Everybody is very excited about bringing the purple line to this community and hopes to see it happen sooner rather than later.

The reasons that people are so enthusiastic about the purple line, one is that if they want to commute to and from the campus from other parts of Prince George's County or Montgomery County, it is currently very difficult to do that and a lot of people are forced to drive. Not because they want to, but because there is no easy alternative.

Second, a major concern in this area is traffic. Our roads are very congested. Route

In particular is extremely congested. People spend a lot of time being frustrated sitting in traffic on Route 1, on East/West Highway and other thoroughfares trying to get to and from College Park and it's very difficult to do that.

The purple line is the best alternative we have for taking cars off our roads and enabling people to use a greener alterative to get to and from work or shopping or recreation or wherever they need to go.

I'm one of the lucky people who gets to ride Metro rail to and from work every day. I ride the green line and it's a great experience. I look forward to my commute, which I think few people who have to drive could say.

I get to read, I can listen to my Ipod, I don't have to worry about traffic and staying out of an accident. It's a very pleasurable experience.

But I'm one of the people that the original system was designed for, who commutes in and out of DC and that's kind of the old model. Our patterns of development and work and recreation have changed a lot since the Metro system was first designed. A lot of people do need to travel east/west.

If you have to go all the way into DC and then all the way out again, it just doesn't work. So I hope that people who need to commute east and west across our two counties will soon get to share the pleasure that I experience every day riding Metro rail. Thank you very much.

- RECORD #827 DETAIL

First Name :	Mayor Lee P.
Last Name :	Walker
Business Name :	Town of Landover Hills
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	
Attachments :	12.pdf (2 mb)

W13

Testimony of Lee P. Walker,
Mayor of the Town of Landover Hills
Regarding the Purple Line

After reviewing the Executive Summary and having attended prior meetings regarding the proposed Purple Line; overall, it can be said that the Purple Line would beneficial to the designated areas. However, there are some additional factors that should be taken into consideration as the project moves forward.

First of all, there is a need for a more in dept explanation of how the Purple Line would connect or benefit major activity centers that are not along the designated corridor; additionally, given the width of the corridor at certain points, where will the dedicated and exclusive lanes be placed along the corridor?

Secondly, it is hoped that refined fuels will be used on the standard busses to help reduce the level of harmful emissions on the environment.

In the section of the Purple Line Executive summary entitled, "Financial Feasibility", there are statements regarding cost factors and sources of funding. In addition to these items, benefits to the consumer should be given a closer look, since that is the primary focus of the Purple Line project.

As the project moves further in the planning process, acquisition of property and displacement of residents should be given careful consideration in the final Environmental Impact Statement.

It is felt that the above factors should be given careful consideration in order to provide greater benefits to the community at large.

Thank You,

- RECORD #854 DETAIL

First Name :	Mayor Lee P.
Last Name :	Walker
Business Name :	Town of Landover Hills
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	Thank you very much.Good morning MTA representatives and Purple Line and all others gathered here. I'm Lee P. Walker, Mayor of the Town of Landover Hills. I'm happy to be here this morning to add my comments in support of the Purple Line. After reviewing the Executive Summary and attending prior meetings regarding the proposed Purple Line, overall it can be said that the Purple Line would be beneficial to the designated areas. And we at the Town of Landover Hills, as I mentioned, support this concept. However, there are some additional factors that should be taken into consideration as the project moves forward. First of all, there's a need for a more in-depth explanation of how the Purple Line would connect or benefit major activity centers that are not along the designated corridor. Additionally, given the width of the corridor at certain points, where will the dedicated and exclusive lanes be placed along the corridor? Secondly, it is hoped that refined fuels will be used on the standard buses to help reduce the level of harmful emissions on the environment. In the section of the Purple Line Executive Summary entitled, Financial Feasibility there are statements regarding cost factors and sources of funding. In addition to these items, benefits to the consumer should be given a closer look since this is the primary focus of the Purple Line Project. As the project moves further into the planning process, acquisition of property and displacement of residents should be given careful consideration in the final Environmental Impact Statement. It is felt that the above factors should be given careful consideration in order to provide greater benefits to the community at large. Thank you very much.

- RECORD #1216 DETAIL

First Name :	Mayor Bruce
Last Name :	Williams
Business Name :	City of Takoma Park
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : B-R-U-C-E, W-I-L-L- I-A-M-S. Good afternoon. I am the Mayor of the City of Takoma Park here today on behalf of the Takoma Park City Council to urge the State of Maryland to provide, to pursue funding for construction of the medium investment light rail purple line.

The Takoma Park City Council recently passed Resolution 2008-86 which includes detailed reasons for this recommendation and we are submitting the resolution for the record.

Why the medium investment light rail option? The City of Takoma Park has been considering options of the purple line through and near Takoma Park since 1999. We have consistently advocated for light rail transit stations in Long Branch and at the Takoma Langley crossroads intersection of University Boulevard and New Hampshire Avenue to help spur our economic development efforts and to serve the transportation needs of our transit dependent residents.

The many reasons this option will best benefit the community are listed in the attached resolution, which like all of our previous resolutions on the purple line, passed unanimously.

We care deeply about our environment and know that as a region, we must both reduce our dependence on automobiles and reinvest in already developed communities.

With the medium investment light rail purple line, there will be 17,000 fewer auto trips every day and 180,000 fewer vehicle miles traveled every day. How can our region afford not to take advantage of these critical savings in congestion and in air pollution?

Bus rapid transit options for the purple line are not good options for us. Why? Buses would not meet the ridership demand that already exists in our community. Buses would get stuck in the same traffic congestion that already exists in our community, and buses would not give the strong economic shot in the arm that our community's commercial districts desperately need.

It's not a cost savings to build an under sized and slow transit system and retrofitting can be very costly.

Given that the purple line will be constructed through already developed communities, it is better to build it right the first time. As a local government, we know money is tight. But times like these are often the best times to invest in public infrastructure.

Acquisition costs and labor costs can be a bit lower. Infrastructure planning and construction can take place while redevelopment plans are revised and financing is arranged. By the time private developers are in a position to invest in their projects, the purple line can be in place. We have already been working on new sector plans with staff from the Maryland National Capital Park and Planning Commission in both counties anticipating this project.

The City of Takoma Park pledges to work with the State of Maryland, Montgomery and Prince Georges Counties and our federal representatives to see that the purple line is funded and constructed in the very near future.

We urge the State of Maryland to act now to submit the purple line as a light rail system to the Federal Transit Administration for funding approval. Takoma Park and many other communities are depending on it. It's the right thing to do for our community and our region, and it's the

right time. Thank you.

- RECORD #2281 DETAIL

First Name :	Mayor Bruce
Last Name :	Williams
Business Name :	City of Takoma Park
Address :	7500 Maple Avenue
City :	Takoma Park
State :	MD
Zip Code :	20912
Email Address :	
Submission Content/Notes :	
Attachments :	City of Takoma Park.pdf (789 kb)

The City of Takoma Park

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7500 Maple Avenue
Takoma Park, MD 20912

Testimony of the City of Takoma Park
Maryland Transit Administration Public Hearing
Purple Line Transit System
November 22, 2008

Good afternoon. I am Bruce Williams, Mayor of the City of Takoma Park, here today on behalf of the Takoma Park City Council to urge the State of Maryland to pursue funding for and construction of the medium investment light rail Purple Line. The Takoma Park City Council recently passed Resolution 2008-86, which includes detailed reasons for this recommendation, and we are submitting the resolution for the record.

Why the Medium Investment Light Rail?

The City of Takoma Park has been considering options of the Purple Line through and near Takoma Park since 1999. We have consistently advocated for light rail transit stations in Long Branch and at the Takoma/Langley Crossroads intersection of University Boulevard and New Hampshire Avenue to help spur our economic development efforts and to serve the transportation needs of our transit-dependent residents. The many reasons this option will best benefit the community are listed in the attached Resolution 2008-86, which like all of our previous resolutions on the Purple Line, passed unanimously.

We care deeply about our environment and know that, as a region, we must both reduce our dependence on automobiles and reinvest in already-developed communities. With the medium investment light rail Purple Line there will be:

- 17,000 fewer auto trips every day, and
- 180,000 fewer vehicle miles traveled every day

How can our region afford not to take advantage of these critical savings in congestion and air pollution?

Why Bus Rapid Transit Is Not a Good Option

Bus rapid transit options for the Purple Line are not good options for us. Why?

- buses would not meet the ridership demand that already exists in our community
- buses would get stuck in the same traffic congestion that already exists in our community
- buses would not give the strong economic shot in the arm that our community's commercial districts desperately need

It is not a savings to build an undersized, and slow, transit system; and retro-fitting can be costly. Given that the Purple Line will be constructed through already developed communities, it is better to build it right the first time.

Now is the Time

As a local government, we know money is tight. But, times like these are often the best times to invest in public infrastructure. Acquisition costs and labor costs can be a bit lower. Infrastructure planning and construction can take place while redevelopment plans are devised and financing is arranged. By the time private developers are in a position to invest in their projects, the Purple Line can be in place.

The City of Takoma Park pledges to work with the State of Maryland, Montgomery and Prince George's Counties, and our federal representatives to see that the Purple Line is funded and constructed in the very near future.

We urge the State of Maryland to act now to submit the Purple Line, as a light rail system, to the Federal Transit Administration for funding approval. Takoma Park and many other communities are depending on it. It's the right thing to do for our community and our region, and it's the right time.

Thank you.

Introduced By: Councilmember Wright

Resolution No. 2008 -86

Resolution Recommending Funding the Purple Line Medium Investment Light Rail Transit Alternative

WHEREAS, the State of Maryland has completed studying the alignment and mode alternatives for the Purple Line and has written the Alternatives Analysis/Draft Environmental Impact Statement; and

WHEREAS, the State of Maryland, with input from the community, city and county governments, and elected officials, will be deciding which mode and alignment and phasing of three projects the State may request funding for: the Purple Line, the Corridor City Transitway and/or the Baltimore Red Line; and

WHEREAS, fiscal, environmental, and economic sustainability are goals of the City of Takoma Park; and

WHEREAS, a livable community that is vibrant, healthy, and safe with convenient transportation for all of its residents is also a goal of the City; and

WHEREAS, the Purple Line, as proposed, would have three stops near Takoma Park that will serve residents, improve access to local businesses and provide an incentive for transit-oriented development: one at Arliss Street and Piney Branch Road ("Arliss Street"), one at University Boulevard and Gilbert Street ("Gilbert Street"), and one at University Boulevard and New Hampshire Avenue ("Takoma/Langley Crossroads"); and

WHEREAS, the population living in the vicinity of the proposed Purple Line is more transit dependent than other areas in Montgomery County; and

WHEREAS, the Purple Line would directly connect many transit dependent residents in Montgomery County and Prince George's County with important regional employment centers including New Carrollton, the University of Maryland, Silver Spring and Bethesda; and

WHEREAS, the Purple Line would also connect residents to the Metrorail Red, Green and Orange Lines; the MARC Brunswick, Camden and Penn Lines; Amtrak; and regional and intercity bus lines; allowing convenient access throughout the region; and

WHEREAS, there are many bus riders along the proposed Purple Line route whose commute time will become shorter, increasing their quality of life and expanding their employment opportunities; and

WHEREAS, the Takoma Park City Council has long supported light rail transit as the mode most beneficial for Takoma Park residents and business owners; and

WHEREAS, light rail transit may be provided in short train configurations allowing for much greater ridership capacity than bus rapid transit, which is provided by single car vehicles; and

WHEREAS, the estimated average travel time between Bethesda and Adelphi will be 31 minutes for the medium investment light rail Purple Line alternative and 40 minutes for the medium investment bus rapid transit Purple Line alternative; and

WHEREAS, the medium investment bus rapid transit alternative will share travel lanes to a much greater extent than the medium investment light rail alternative, and will therefore be more susceptible to delays due to traffic congestion; and

WHEREAS, residents of the Washington, D.C. region are comfortable with, and heavy users of, the area's existing rail transit system, and have a positive image of rail transit; and

WHEREAS, it is in the community's interest to invest in a light rail transit system, since it would allow for high ridership capacity and is faster and less subject to disruption than a bus rapid transit system; and

WHEREAS, installation of light rail infrastructure provides a clear signal to commercial property owners and investors of a permanent commitment to a transit route and station, encouraging investment in, and redevelopment of, properties adjacent to a light rail station, while bus rapid transit routes and stations are more easily moved, thus adding risk to commercial investment decisions; and

WHEREAS, the proposed light rail Purple Line will spur redevelopment of commercial properties in Takoma Park's priority redevelopment areas; and

WHEREAS, the Takoma Park Master Plan, approved and adopted in December 2000, recommends "tree-lined sidewalks, landscaped medians, and street trees in wide panels separating sidewalks from traffic" and "on-road bikeways and 'shared use paths' (8-foot to10-foot wide sidewalks) on both sides" of streets; and

WHEREAS, ample, shaded sidewalks separated from fast moving traffic by street trees would substantially improve transit rider access to the proposed Purple Line; and

WHEREAS, bicycle lanes would substantially improve the multi-modal connectivity of Takoma Park residents and businesses with other centers in our region; and

WHEREAS, the existing right-of-way and State Highway streetscape requirements only allow for a limited width of sidewalk with no trees or buffer and the plans for the Purple Line rely on the State Highway requirements; and

WHEREAS, greater right-of-way should be provided for so that there is enough room that sidewalks may be safe, comfortable, and inviting; and

WHEREAS, the addition of the proposed Purple Line will widen University Boulevard and Piney Branch Road roadbed by an additional minimum 20 feet of paved surface; and

WHEREAS, widening University Boulevard will make it more difficult for pedestrians to cross to the transit station and area businesses, and will take land from adjacent property owners; and

WHEREAS, careful review of the design of University Boulevard may result in alternative lane configurations or other creative design solutions that would reduce the amount of right-of-way needed, especially at the University Boulevard/New Hampshire Avenue intersection; and

WHEREAS, the areas around the proposed stops at Arliss Street, Gilbert Street, and Takoma/Langley Crossroads, are the foci of intensive revitalization efforts; and

WHEREAS, the tens of thousands of residents living near the proposed stops at Arliss Street, Gilbert Street and Takoma/Langley Crossroads are sorely in need of beautification, streetscape amenities, and facilities to improve public space and to allow people to walk to public transit in comfort; and

WHEREAS, these existing and new residents, shoppers, and businesses would greatly benefit from the beautification option of grass along the transit line tracks ("grass tracks"); and

WHEREAS, grass tracks will reduce storm water run-off into sensitive waterways, including Long Branch and Sligo Creek; and

WHEREAS, the land uses along the proposed Purple Line route include many amenities such as housing, employment, services, and retail and entertainment outlets, and the area has a substantial capacity for higher density mixed-use development near the proposed transit stops; and

WHEREAS, even with transit improvements, there is a need for more parking in the Takoma/ Langley Crossroads shopping and residential areas; and

WHEREAS, on-street parking is extremely important to the viability of street-facing commercial enterprises in transit-oriented mixed-use shopping districts; and

WHEREAS, in some of the Purple Line alternatives, parking will be lost in side lanes along University Boulevard; and

WHEREAS, the proposed Purple Line route along University Boulevard is a key east-west route linking residential areas with employment centers and transit stations in Montgomery and Prince George's County; and

WHEREAS, University Boulevard is already substantially congested and is destined to become even more congested over time as the region grows; and

WHEREAS, the low-investment Purple Line alternatives would not provide exclusive transit lanes and would have slower service and little incentive for residents to choose transit over a car; and

WHEREAS, the high-investment Purple Line alternatives would elevate the train or bus, creating walls that would divide communities on either side of University Boulevard without providing substantial travel time savings; and

WHEREAS, the medium investment bus rapid transit Purple Line alternative would not run in an exclusive lane, but would share the outside lane of University Boulevard with local buses, requiring the bus rapid transit vehicle to move into the adjoining traffic to pass the local buses picking up passengers at local stops; and

WHEREAS, the medium investment bus rapid transit alignment's use of the outside lane would preclude the use of this lane for future off-peak parking; and

WHEREAS, the medium investment light rail transit Purple Line alternative would operate in an exclusive lane, so that even when vehicle lanes are congested, the light rail vehicles would not be delayed, providing a substantial incentive for transit use; and

WHEREAS, the medium investment light rail transit alignment is in the center lanes of University Boulevard, allowing the outside lane to be used for off-peak parking; and

WHEREAS, all six of the alternatives are projected to meet the cost-effectiveness requirement of the Federal Transit Administration for funding through the New Starts program; and

WHEREAS, the light rail medium investment alternative has the second highest rating of Annual User Benefit (in hours) of the six alternatives, while having significantly lower capital costs than the alternative with the highest User Benefit; and

WHEREAS, the medium investment light rail alternative would reduce the region's Year 2030 daily vehicle trips by 17,253 and daily vehicle miles traveled by 183,603, while the medium investment bus rapid transit alternative would reduce the daily vehicle trips by 14,137 and 113,562, respectively; and

WHEREAS, development of the full Purple Line route from Bethesda to New Carrollton will provide the greatest access for Takoma Park residents to the region's existing transportation systems; and

WHEREAS, use of the Georgetown Branch right-of-way between Connecticut Avenue and the Bethesda Metro greatly reduces the amount of time it would take Takoma Park residents to reach Bethesda, since the travel time for this segment using the right-of-way would range from 2.4 to 5.5 minutes, based on the alternative chosen, as compared to 10.7 minutes if the right-of-way is not used; and

WHEREAS, of the six alternatives presented, the light rail transit medium investment alternative will provide the most efficient, convenient, safe, and healthy transportation and will do the best job of improving the fiscal, environmental and economic health of Takoma Park and our inner beltway region of the State of Maryland.

NOW, THEREFORE, BE IT RESOLVED THAT the City Council of the City of Takoma Park

1. Strongly urges the State to proceed with the submission of the full length of the Purple Line transit way to the Federal Transit Administration and to work for its funding and construction in the near term.

2. Strongly urges the Secretary of Transportation to select the medium investment light rail transit option as the Purple Line alternative to submit to the Federal Transit Administration.

3. Urges the provision for future installation of sidewalks of a width that maximizes pedestrian safety and mobility, shaded by trees and buffered from traffic along University Boulevard; either by taking, by easement or by voluntary acquisition of right-of-way, as appropriate.

4. At the same time, urges study of alternative lane configurations or other design solutions to minimize the amount of right-of-way needed to be taken from adjacent properties along University Boulevard.

5. Urges the use of grass tracks in areas such as Takoma/Langley Crossroads and Long Branch and urges the adoption of strict maintenance schedules for these green areas.

6. Urges the provision of on-street parking during non-peak periods in areas where it can be accomplished safely within the existing right-of-way, to support retail activities in adjacent properties.

7. Urges the Secretary of Transportation to work with the State Highway Administration to develop transit areas that will allow continued access to commercial properties in current development and future redevelopment via existing or future streets, intersections, curb cuts, left turn opportunities and traffic signals, while maintaining safety standards for pedestrians, bicyclists and automobiles; and urges the continuation of coordination and communication among the different governmental entities so the strongest possible plan emerges.

8. Expresses appreciation to the State of Maryland and the Maryland Transit Administration for the thorough and high-quality work that has been done by their staffs and consultants in planning the Purple Line transit way.

9. Expresses appreciation to the Executives and Councils of Montgomery County and Prince George's County for their strong support of the Purple Line transit way.

10. Urges the governments of Montgomery County and Prince George's County to support the medium investment light rail alternative of the Purple Line as the alternative that best serves the residents, institutions and businesses of the two counties now and in the long term.

Adopted this 17th day of November, 2008.

Attest:

Jessie Carpenter
City Clerk

- RECORD #857 DETAIL

First Name :	Council Member Patrick
Last Name :	Wojahn
Business Name :	City of College Park
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	Thank you. Yes, my name is Patrick Wojahn. Last name is spelled W-O-J-A-H-N. COURT REPORTER: Spell your first name. MR. PATRICK WOJAHN: Sure. First name is P-A-T-R-I-C-K. COURT REPORTER: Thank you. MR. PATRICK WOJAHN: In the interest of brevity, I also want to echo the comments of the former speakers, the elected officials who spoke earlier today. But I do want to add one additional perspective to it and that is of the City of College Park. We to have endorsed the Purple Line and we support it highly. If anybody wants to know a reason, all you have to do is look at Route 1 and the traffic that we have to deal with on a daily basis on Route 1. We've been looking to have Route 1 rebuilt for a long time and that will be part of the solution to fixing up the problems on Route 1. But on the other hand we know that's not the only solution. We know that we need public transportation to be able to bring people back and forth to the University from areas around the D.C. Metropolitan Area and in particular Montgomery and Prince George's Counties. That's all I have to say today. We look forward to continuing this dialog and I thank you very much for

- RECORD #1328 DETAIL

First Name :	Delegate William
Last Name :	Bronrott
Business Name :	16th Legislative District
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : Bill Bronrott, B-I-L-L, B-R-O-N-R-O-T-T. I have the honor of representing District 16 in the Maryland House of Delegates. I serve on the Appropriations Sub Committee on Transportation and the Environment. I chair the Montgomery House Delegations Land Use and Transportation Committee among the council of Government's Transportation and Planning Board.

I'm also serving on the special task force set up by our County Executive looking at the base realignment up at the National Naval Medical Center, one day Walter Reed. And I co-chair a new Montgomery/Prince George's County Purple Line legislative caucus.

I'm pleased to join with my district 16 colleagues in support of the Purple Line between Bethesda Metro and New Carrollton Metro and at the same time complete the Capitol Crescent Trail to bring it out from the tunnel in Bethesda all the way through to Silver Spring.

There is an urgent need to advance the 21st Century vision of livable, sustainable, healthy and safe communities. We have to once and for all change the paradigm of how we engineer our communities and move away from oil dependancy to a new green direction where mass transit and bicycle and pedestrian safety and mobility are cornerstones for how we grow.

Smart Growth was born in Maryland with our inner beltway suburbs in mind. And the time is long overdue to make good on the promise of Smart Growth by investing and in many cases when you look at the Purple Line corridor, reinvesting in so many of the communities along the 16 mile line. It is hugely, a hugely important opportunity for our counties and our region.

The decision to build or not to build or where to build the Purple Line is one of the most decisions we'll make. It's right up there with our decision to build Metro rail and our decision to invest in this county and live sciences. And the state, and the state's decision should be looked at, sort of 50 years out with respect to the kind of transit system that we're going to build that will give us the greatest capacity and durability over time and clearly light rail is superior.

Now, Governor O'Malley's committed funding through the design phase and from everything we've heard our case for federal funding is strong, the Draft ENVIRONMENTAL IMPACT STATEMENT and Alternatives Analysis has been done in a very sound and responsible way to give us, put us in an advantageous position with the federal government.

Purple Line falls within this federal enclave, which means that it should be considered a high priority project, not unlike what the Metro Rail pioneers said when they made the case of the federal government in the 1970's for that 101 mile system. We know that a Purple Line light rail from the heart of downtown Bethesda through downtown Silver Spring through the College Park campus and onto New Carrollton Metro with many neighborhoods in-between will do more to move people efficiently and safely, will do more to relieve the strain on Metro rail, will do more to link up our region with numerous Metro rail lines, MARC, Amtrak, and will do more to meet our air quality goals and many other opportunities that are before us.

We should hear the concerns of the neighbors along the alignment, try to mitigate as much as we possibly can to provide safety and accessibility, but at the same time we can't allow this most significant transportation project to be delayed or derail, derailed by a non-starter alternative such as taking it up Jones Bridge Road into what is clearly a

completely failed intersection. The best we can hope for in coming years is bringing it up to grade D. But the construction money for that over by what will be Walter Reed isn't even in line yet. So we will in effect be hitting a brick wall.

Again, the Purple Line is the single most meaningful opportunity to meet our enormous energy and environmental and economic challenges. It is certainly a great way for us to create a vibrant series of communities where we can bring together people in the most meaningful way possible and as the Washington Post Editorial stated on Sunday, light rail is sturdier, it's more cost-effective, it's our one opportunity to spur Smart Growth in Montgomery and Prince George's counties and as it said in its headline, full speed ahead. Thank you very much.

- RECORD #1326 DETAIL

First Name :	Delegate Al
Last Name :	Carr
Business Name :	State Delegate-Districe 18
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : Al Carr, A-L, C-A-R-R. Good evening, my name is Al Carr, I live in Kensington and I represent the citizens of district 18 in the Maryland House of Delegates.

I've been following this debate for nearly 20 years. I support the Purple Line but I do not agree with those who say that we should limit our options to light rail as the only mode and to the Capitol Crescent trail as the only route. To achieve the best result, we need to make sure that we can think outside the purple box. In planning for the Purple Line, we need to keep our options open, preserve and expand the trail, address growth at the Bethesda Naval Hospital due to BRAC, address local traffic problems that the ICC will bring, and be prepared for all financial scenarios.

A true bus rapid transit solution along Jones Bridge Road needs to be added to the alternatives being considered. The newest transit line in North America opened a few weeks ago in Cleveland, Ohio, where I was born. My son and I plan to ride it next week when we visit grandma for Thanksgiving. Cleveland is no stranger to light rail. Unlike the Washington area, they never dismantled their light rail network. They considered light rail during the planning for their new line, but they ultimately chose bus rapid transit. They found BRT to be an efficient, environmentally friendly way to move people and to support economic development by being twice as cost-effective as light rail. In these times of extreme financial challenge, we need to be prepared for a range of options with a range of price tags.

Bus rapid transit on Jones Bridge Road is an option that will preserve the Capitol Crescent Trail. This is a heavily used wonderful urban park that brings people together. I don't know how many of the people in this room have actually lived next to a light rail line. Well, I have, and I can tell you that there is no better way to forever divide a neighborhood and keep people separated and that is what will happen if we put light rail on the Capitol Crescent Trail.

The entire Connecticut Avenue corridor including Kensington has traffic problems that are about to get worse. This corridor suffers from pedestrian fatalities, extreme congestion and dangerous cut-through traffic. All of these problems will be made worse by growth at the Naval Hospital due to BRAC. And by the added traffic that will be caused by the Inter-County Connector.

If we fail to consider bus rapid transit on Jones Bridge Road, we will miss an opportunity to address these problems and we will continue a pattern of piecemeal transportation planning rather than coordination.

Let's not paint ourselves into a purple corner. Let's keep our options open so that the end result will be a smarter Purple Line.

- RECORD #1222 DETAIL

First Name :	Councilmember Valerie
Last Name :	Ervin
Business Name :	District 5
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : Valerie, V-A-L-E-R-I-E, Ervin, E-R-V-I-N. Thank you very much for the opportunity to comment. I don't have any written remarks prepared. I didn't actually think I was going to speak today, but I felt compelled to do so.

Coward has asked the question, sit is safe? Vanity asks the question, is it popular? Expediency asks the question, is it political? But conscience asks the question, is it right?

There comes a time when one must take a position that is neither safe nor popular nor political, but one makes a decision because it's right.

Today I come before you to let you know about my extreme and powerful position in favor of the purple line. I have been working on this issue for six years.

When I ran for office in 2006, I signed the purple line pledge which talked about the master plan of light rail above grade alignment. Myself as well as many dozens of elected officials signed that purple line pledge and I am here today to stand on that and I'm here today to stand on principle.

I live on the corner of Wayne Avenue and Dale Drive in Silver Spring in the district that I represent. I can see that proposed alignment from my house.

I feel a great deal of empathy and I listen to my friends and neighbors in my community because the community is very split on its support of that proposed alignment. But I'm here also to say that I believe in preserving and improving all communities along the alignment, including the economic development of Silver Spring Long Branch, Takoma, Langley and Prince Georges County.

I spoke a little earlier in a press conference about the issue of equity in transportation and the issue of participatory justice.

We have forgotten in many cases as we've talked about this purple line about the users of the transit line and the users of bus right now who are mostly poor and people of color. We see them every day when we go to work standing out at the bus stop in cold weather like this morning, when it rains, when it snows, no matter what the weather.

They have few options when it comes to transit. I believe that we cannot leave them out as we have this conversation about what the future of our county and what the future of our community will look like.

We are very fortunate that generations ago, people thought about us before we were even born. This purple line is one of those kinds of issues.

We all drink deeply from wells we did not dig. And so for me, we are here to take our place alongside those of us generations ago who built the roads and the bridges for us and for our children and for future generations. Thank you.

- RECORD #3021 DETAIL

First Name :	Council Member Valerie
Last Name :	Ervin
Business Name :	District 5
Address :	Stella B. Werner Office Building
City :	Rockville
State :	MD
Zip Code :	20850
Email Address :	
Submission Content/Notes :	
Attachments :	Councilmember Valerie Ervin.pdf (97 kb)

MONTGOMERY COUNTY COUNCIL
ROCKVILLE, MARYLAND

VALERIE ERVIN
COUNCILMEMBER
DISTRICT 5

January 23, 2009

Mr. John Porcari
Secretary of Transportation
Maryland Department of Transportation
7201 Corporate Center Drive
Hanover, MD 21076

Dear John Secretary Porcari:

After reviewing hundreds of resident's comments, the Maryland Transit Administration's Draft Environmental Impact Statement, the County Executive and Planning Board's recommendations, the Montgomery County Planning Board's Staff Report, and reviewing similar projects, it is my opinion that the Purple Line will provide Montgomery County with much needed long-term transportation infrastructure and environmental benefits. However, I want to ensure that the development and implementation of the Purple Line does not negatively impact District 5 residents who live along the alignment. For more than two years, I have been meeting with numerous residents in my own neighborhood who have raised several issues that need to be addressed by MTA staff as the project moves forward.

I would like to request that in addition to the at-grade option for Wayne Avenue, that the MTA conduct a detailed analysis of the community's request for a tunnel (from the Silver Spring Metro to Mansfield Road) as part of the locally preferred alternative and preliminary engineering process. Considering the scale and impact that this project will have on downtown Silver Spring and its surrounding communities, I believe that a detailed analysis of both options merits consideration. With either option, at-grade or tunnel, I concur with the recommendations made to date that a stop at Dale Drive is not currently justified.

All alignment options through Silver Spring must include a detailed plan to improve pedestrian safety and bicycle accessibility, account for future automobile growth, address access to existing and new residences, public facilities and private businesses, encourage long-term transit usage and ensure vibrant long-lasting communities.

STELLA B. WERNER OFFICE BUILDING • 100 MARYLAND AVENUE, ROCKVILLE, MARYLAND 20850
240/777-7960 OR 240/777-7900 • TTY 240/777-7914 • FAX 240/777-7989
WWW.MONTGOMERYCOUNTYMD.GOV/COUNCIL

I am a strong advocate for mass transit improvements and building the infrastructure that the County needs for its future, but this cannot be done in a manner that impacts residents' quality of life. Thank you in advance for considering this request and for working with my office on issues that my constituents have raised. I look forward to continuing to work with your staff as new issues and concerns arise throughout the design, planning and implementation of this important project.

Sincerely,

Valerie Ervin – District 5

c: Paul J. Wiedefeld, MTA, Administrator
Michael Madden, MTA, Purple Line Project Manager
Phil Andrews, President, Montgomery County Council
Roger Berliner, Vice-President, Montgomery County Council
Nancy Floreen, Councilmember – At-Large, Montgomery County Council
George Leventhal, Councilmember – At-Large, Montgomery County Council
Duchy Trachtenberg, Councilmember – At-Large, Montgomery County Council
Marc Elrich, Councilmember – At-Large, Montgomery County Council
Mike Knapp, Councilmember – District 4, Montgomery County Council
Don Praisner, Councilmember – District 2, Montgomery County Council
Isiah Leggett, County Executive, Montgomery County Maryland
Arthur Holmes, Director, Montgomery County Department of Transportation
Royce Hanson, Chair, M-NCPPC, Montgomery County Planning Board
Rollin Stanley, Director, M-NCPPC, Montgomery County Department of Planning
Glenn Orlin, Deputy Director, Montgomery County Council
Mark Gabriele, President, Seven-Oaks Evanswood Civic Association
Alan Bowser, President, Park Hills Civic Association
Darian Unger, President, Silver Spring Citizens Advisory Board
Jon Lourie, President, Silver Spring Urban District Advisory Board

- RECORD #1327 DETAIL

First Name :	Senator Brian
Last Name :	Frosh
Business Name :	16th Legislative District
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes :

My name is Brian Frosh, it's B-R-I-A-N, F-R-O-S-H. I represent the 16th District of the state in the State Senate. Thank you very much for allowing me to spend some time with you this evening. I think there's very little that I can tell you about this project that you don't already know.

Let me just say, first of all, that I support the Purple Line and I support the light rail option. And I think George Leventhal's comments were, were right on target. I'd like to amplify just a couple of things.

I was the chair of Montgomery County's House Delegation in 1992. I invited Secretary of Transportation, Jim Lighthizer, to Montgomery County to walk the Capitol Crescent Trail, what was then a heavy rail line. At the conclusion of that walk, he said we'll fund the Capitol Crescent Trail.

I take a second seat to no one in love with the Capitol Crescent Trail. Not only do I use it for recreation, I use it to commute to work, I use it a number of times every week, every season of the year. I think it's very important to preserve, extend and complete the Capitol Crescent Trail and the light rail option allows for that. I think it allows for it in a way that will accommodate hikers and bikers. It will be useful, peaceful and fun.

And I think it is compatible with light rail and anybody who thinks that we can continue in our area relying upon single- occupancy vehicles is just flat wrong. We've gotta, we've got to connect to Bethesda to Silver Spring, College Park and New Carrollton by mass transit, I think this is the most important mass transit project in this region for many, many decades. Perhaps since Metro was first conceived and built.

As Councilman Leventhal mentioned, it will not only connect those subway stops but also connect the light rail to the MARC line and Amtrak. It promises, I think, great benefits for this area, not only in transportation but also in terms of protection of our environment, avoidance of pollution, avoidance of greenhouse gas omissions. I think it makes a great deal of sense and I commend it to you. Thank you very much.

- RECORD #1176 DETAIL

First Name :	Delegate Barbara
Last Name :	Frush
Business Name :	21st Legislative District
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	I'm a member of the Maryland House of Delegates representing District 21 which includes the City of College Park. I'm here to strongly support the expeditious building of the purple line. Let me start out by saying I hadn't planned to say this, but I agree with the two speakers ahead of me. Why not start it in Prince George's County? Why not start it where the people want it and want it built now? It would certainly eliminate a lot of problems and by the time we get to Montgomery County, I'm sure we would reach a consensus. The purple line is an important, important project to all of our communities. It will take cars off the road, it will allow us to move from east to west more easily than in a car. I live in the community of Calverton which is right off Interstate 95. When I get on Interstate 95 in the morning, for the most part that road is at a standstill and it's at a standstill because traffic just can't move. What a pleasure it would be to hop on the light rail and move east to west. Let me also say that it will allow us to get to our jobs and to get to shopping and to get to areas that we need to get to without causing problems. As Chairman of the House Environmental Matters Committee's Environment Subcommittee, I deal a lot with traffic and the problems that are caused by air pollution. Getting cars off the road is an important, important aspect of reducing air pollution. I was at Children's Hospital just the other day and one of the things which I found out which is something that absolutely shocked me is the Washington Metropolitan area has the highest rate of asthma in the world. Do you think it's because we have so much traffic? I do. I can't think of anything else. We have no industry. We have nothing that would cause a problem. It's because of our traffic. Let me also say that I was at another meeting with the Census Bureau and found out that we have the longest commutes in the country. It is because our system has failed us. I'm here today to plead with you to move forward on the purple line. We need to stop this nonsense and move forward. We need to have mass transit. It's what our people deserve and for heaven's sakes, let's save the environment. Thank you very much.

- RECORD #1330 DETAIL

First Name :	Delegate Ana Sol
Last Name :	Gutierrez
Business Name :	18th Legislative District
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : Good evening. My name is Ana Sol-Gutierrez. And I live at 3370 Turner Lane, Chevy Chase. Ana is A-N-A, the two last names, Sol, S-O-L, and Gutierrez, G-U-T-I-E- R-R-E-Z. Can't even order pizza with Gutierrez.

But I welcome you to my district, I represent district 18 which is where this hearing is taking place and I'm delighted that you did choose this place. District 18 includes the neighborhoods on both sides of a very overburden beltway as well as the east west corridor of transportation. So I'm pleased to speak tonight in strong support of the light rail Purple Line.

Let me summarize why the Purple Line is so important for my district and for Montgomery County as well as for Maryland. It provides an efficient, environmentally friendly east-west transportation connection that brings people and jobs together. What better project could you have that meets all of those goals? It takes pressure off of roads and alleviates traffic congestion. It serves many, many people including those who do not have a car. And it serves them safely, efficiently and reliably.

Many of these individuals currently take one, two or three buses to go from their home to their work and their trip on a daily basis is not reliable. It helps address many environmental problems, including air pollution and global warming.

I support the light rail alternative for several important reasons. The most important that people should remember is that projected ridership for 2030 is 68,000 riders. And it is the highest of any ridership for any bus rapid transit system, not only in Montgomery County, not only in Maryland, but in the United States.

We have not worked this hard for 20 years to build a system that will obsolete 15 years after it's built. No. Light rail lines can carry a hundred thousand or more without any problem or additional cost as soon as it's built.

Light rail is more compatible with the Georgetown branch hiker/biker trail which should be completed into Silver Spring as part of this project. My constituents have waited too long for this trail to be finished as it has been westward from Bethesda for more than a decade. I grew up with the freight trains behind my house. Yes, they were loud and they carried primarily freight, not people.

Light rail trains are quiet and non-polluting so they will not disturb adjourning home owners or the thousands of users of the trail. I am very pleased to hear that the Washington area bicyclists association has taken a position in support of light rail for this reason.

Light rail has a great record in fostering sensible pedestrian-friendly development. While our district is doing well in this regard, it is important in times of economic downturn for us to build green infrastructure that will create jobs near our residential communities who need them, including Long Branch and Tacoma Langley crossroads.

I cross our county many times during the week and can see every day the growing need for light rail Purple Line. If we do not build this, families, businesses, communities will suffer as the beltway breaks down and traffic pours through every secondary road in our neighborhoods.

Purple is the color of unity. I'm wearing it tonight, symbolically. So, if Montgomery County is completely united with Prince George's County, we can see construction start on this tremendous project in 2012. We

can witness our fellow citizens riding the quiet, efficient, non-polluting light rail trains by 2015. I hope I'm around to see that. If we are united, if we are ready to work hard to overcome odds, we have a great new president coming in office who is fond of saying, "Yes, we can". Or as we say in Spanish, (speaking in Spanish). Yes, we can rebuild our communities that need it, yes, we can rebuild a newer and greener infrastructure for the future, si, yes, we can counter global warming by reducing our dependancies on fossil fuels, and yes, we can break down the barriers between our counties by strengthening the ties between them with the Purple Line. Yes, we can. (Speaking in Spanish). Thank you very much. Yes, I do.

- RECORD #1217 DETAIL

First Name :	Delegate Sheila
Last Name :	Hixson
Business Name :	20th Legislative District
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	Sheila, S-H-E-I-L-A, Hixson, H-I-X-S-O-N. Thank you very much for having me here. I too represent District 20 in the Takoma Park Silver Spring area and I am Chair of the House Ways and Means Committee which deals with transportation policy at the state level. After a number of years of discussion and study, it is now time for us to make a final decision upon the proposed purple line. The study determined that a feasibility of the line as it would impact on the environment and the homes in the area and concluded that any impact would be minimal, and that in fact a new transit line would be highly desirable. The line as you know will serve two jurisdictions. Montgomery and Prince Georges Counties. I am urging the support of the light rail rather than the bus rapid transit in spite of the fact that the light rail may require a large capital investment at the onset, and here are the reasons. Light rail is a smoother, faster, quieter and sturdier ride. It is also possible to add more rail cars in the future as the number of riders increase, which would then be a more economical choice. The light rail system could serve as many as 60,000 riders each day. It will support low and moderate income residents along its path and save many of these riders an extra hour each day. It will take as many as 20,000 cars off the road, relieve traffic and reduce carbon emissions. It will also provide the service to the University of Maryland so that students, employees and visitors will have better and safer access to resources at the school. We are expecting congressional support for this project and must make our decision as soon as possible. Most important, we are all aware that our commute is becoming more difficult each year and our riders, drivers, residents and businesses will suffer if we do nothing. We have always strived to improve the quality of life for our citizens. Let's make this decision finally now and together. Thank you.

- RECORD #1214 DETAIL

First Name :	Delegate Tom
Last Name :	Hucker
Business Name :	20th Legislative District
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	

Submission Content/Notes : Tom, T-O-M, Hucker, H-U-C-K-E-R. Thank you for allowing me the opportunity to offer my thoughts on the important decisions before you. I'm a vigorous supporter of the purple line.

I represent the Maryland General Assembly on the Board of Purple Line Now, and with Chairpersons Bill Bronrought and Tawana Gains, I'm a founding member of the purple line legislative caucus.

For years before I was elected, I was an advocate for this project and was proud to stand with Governor Glendening in Langley Park when he announced his support for the route in 2001.

Since my election two years ago, I have received the support of a clear super majority of my constituents urging me to continue to fight for the purple line. I'm here to represent their voices.

This project is especially critical to the residents of Silver Spring and Takoma Park. I'm very proud they're all members of the District 20 delegation as well as District 5 council member Valerie Irvin are such strong supporters of the purple line and the light rail option.

Yes, we recognize the need to bring everyone's voice to the table to consider the neighborhood impacts of various proposals. But doing nothing is not an option.

We cannot lose sight of the tremendous need for dramatically increased transit capacity in our district. We are the most diverse and the lowest income of any legislative district in Montgomery County.

Fully 24 percent of Silver Spring residents do not have cars. A higher percentage than any nearby area except our neighbors in Langley Park. They are disproportionally African American Latino, disproportionately renters, not homeowners, disproportionately seniors and hardworking students, disproportionately low to moderate income.

They deserve first class transit options. And so do the rest of our constituents with cars who have to be presented with first class transit options that only rail can provide if they are going to be tempted to leave their cars at home.

I attended the Chevy Chase hearing and heard the self-interested voices of opponents there. Many of them are well intentioned and have received the intentional well funded misinformation campaign.

They have a right to their opinions. But we as elected and appointed officials cannot allow the recreational interests of a small group of well connected golfers to supercede the needs of 68,000 riders per day.

They say we need more studies, but this issue has been studied for decades. They say we just need more buses, but current buses clearly don't tempt people to leave their cars at home. If they did, it would still take many hundreds of J4 buses to move 68,000 riders per day.

If more buses were a reliable option, we would have chosen that option many years ago.

My constituents also use the Capital - Trail. But unfortunately the trail was not completed to its natural terminus in Silver Spring.

We look forward to the purple line rail project and its efforts to complete and improve the trail and extend it to downtown Silver Spring so that our pedestrians and cyclists as well as Metro, Marc and ride on riders can

take the trail from downtown Silver Spring while we're spending our money in Bethesda.

I serve in the Environmental Matters Committee in the House of Delegates. We hear harrowing projections each year about the numbers of new residents who are moving to our area.

The Maryland Department of Planning anticipates a million new residents in the next years. That's like adding another Montgomery County to the State of Maryland. We have to do everything we can to encourage those new residents to settle an affordable, walkable, bike friendly and transit oriented community or we will see rush hour volumes of traffic around the clock and a terrible impact on our environment.

Our committee has taken the lead on legislation to encourage affordable workforce housing to build more green buildings, to incentivize transit oriented development and more legislation is on the way this year.

But none of that will matter if we don't also build the increased transit capacity to move 68,000 riders per day that are anticipated to take advantage of the rail option.

I am also one of two legislators assigned to regular stakeholder meetings between the Maryland Department of the Environment and labor and business leaders to shape this year's legislation to address climate change.

Most Marylanders and District 20 residents in particular want our state to hit ambitious targets to reduce our greenhouse gas emissions. We hope Maryland will be a national leader in this effort, but that will be impossible without projects like the purple line rail option.

I want to thank Governor Martin O'Malley and Secretary of Transportation John Porcari, project manager Mike Madden and all the staff who have worked so hard to bring this project so close to reality.

Mike Madden and his team have outlined this project at hundreds of community meetings and listened to the best input our neighborhoods could provide over alignments, landscaping, noise abatement and impact on the trail. I want to thank all the residents who have made their voices heard, that DEIS is much better because of their work.

I sincerely want to thank all the community activists who have worked so diligently to rally for this cause. Harry Sanders, Ben Ross, Web Smedley and others who have worked as volunteers for nearly 20 years for this vision.

Leaders of Purple Line Now, the Sierra Club, League of Women Voters, Progressive Maryland and the Silver Spring and Bethesda Chambers of Commerce and other groups have contributed hundreds of hours and their critical voices to move this debate forward.

Please make the right decision. The time is now for the purple line rail option. Thank you.

- RECORD #1329 DETAIL

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Submission Content/Notes : Yeah, thank you very much. I'm Delegate Lee, I represent district 16 with my colleagues who just spoke. And I just wish to concur with all that they have said about the light rail Purple Line. Oh, excuse me. Susan, S-U-S-A-N, C, middle initial, Lee, L-E-E. May I proceed forward?

As I indicated earlier, I'd like to just express my very strong support for the light rail Purple Line. I think it's time to move forward, not backward. The light rail will connect two major jurisdictions, Prince George's County and Montgomery County, which have experienced both tremendous growth in population, jobs, and have become more diverse and have seen new knowledge-base industries like the high-tech, bio-tech, move in and thrive and do well.

And the light rail will offer many travel-weary commuters an environmentally friendly, unimpeded, fast and smooth ride, quiet ride, between these two major jurisdictions.

Most importantly, the light rail will significantly cut down at the same time on the number of autos on the road, lessen congestion, omit less pollution, not destroy the trail, and get people to their work, home, school and events and restaurants easily and quickly, more so than the proposed bus rapid transit.

Most importantly, it will help hard working individuals, especially those hard working individuals from new immigrant communities who have contributed enormously to the economic vitality of our, both our counties but who now have to take several buses just to get from work, home, and back.

And the light rail is poised to be a strong candidate for federal funding when viewed alongside competing projects because of the 62,000 MTEA estimated riders. It will serve in the benefits of the environment, speed and efficiency. In addition, it has met federal cost effective criteria for funding. Most importantly, president elect Obama has indicated his support for public transit that's not, that not only reduces the commuting time but also benefits the air quality, public health and reduces green house omissions.

As mass transit ridership is surely expected to grow, not decrease, rapidly, we need to support a project that will meet our nations needs, not just today or 2030 but also in the long-term. And light rails in cities like Boston, San Francisco, and in Europe have proven track records of success improving the quality life of those people in those cities for decades.

When the Metro rail was being contemplated decades ago, it pretty much faced the same type of opposition it is faced by the inner Purple Line today. But time has shown it's been a tremendous success and benefit countless of individuals. The Purple Line is now a necessity and not an option so let's move it forward. Thank you very much for letting me testify.

- RECORD #2210 DETAIL

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Richard S. Madaleno, Jr.
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Statement by Sen. Richard S. Madaleno, Jr.
Presented at AA/DEIS Purple Line Hearing
November 18, 2008

During the course of my 20 years in and around the General Assembly, I have seen and heard all of the arguments for and against the Purple Line. After many years of discussion, planning, and community outreach, I still have very serious reservations about this project, from a fiscal standpoint, from an operational standpoint, and with regards to the effects it will have on the communities in our region.

It is no secret that our state, like every other, is facing a severe economic downturn from the global financial crisis. With the end of this crisis nowhere in sight, our state will have to make some very serious decisions on our transportation priorities. Our transportation infrastructure across the state requires serious attention and dwindling gas tax and titling tax revenues, combined with this economic downturn, will severely restrict our spending on many worthwhile projects.

Quite frankly, the state does not have the resources to pay for any of the Bus Rapid Transit (BRT) or Light Rail Transit (LRT) options. Over the past decade, the only major new construction projects the state has moved forward with have been funded primarily with toll-backed revenue bonds. There are no alternative funding mechanisms available for this project. As a member of the Senate Budget and Taxation Committee, I feel confident in reporting that no new revenue options appear politically feasible in the foreseeable future.

Because there are, at best, limited state funds available for this project, the Draft Environmental Impact Statement (DEIS) assumes a local contribution but does not suggest what shape or size that it may be. I think it is irresponsible for the state to propose this project without informing either local county government of what its share might be. I would also note that no local government in the Baltimore region has been asked to make a direct contribution towards the construction or maintenance of their light rail system. Questions about the state's ability to pay should alone prevent the Federal Transit Administration (FTA) from allowing this project to move forward.

It was only a little over a year ago that the state of Minnesota saw a major bridge collapse during the evening rush hour, killing 13 people. This summer, a serious accident on the Chesapeake Bay Bridge led to the discovery of corrosion on the bridge's steel reinforcements, requiring emergency repair. It is clear that other bridges, overpasses, and tunnels in our state will require expensive maintenance in the future.

From a statewide perspective, this transportation project would take the lion's share of transportation investment money for the foreseeable future. The estimated price tag on the high investment light rail transit is nearly $2 billion. Even with very optimistic ridership numbers, the Maryland Transit Administration (MTA) is estimating a daily load of 34,000 round trip riders, of which, 27,200 – 80 percent – will be drawn from some other form of mass transit. Are the remaining 6,800 new riders enough to justify the cost of the system, which at nearly $2 billion, works out to roughly $294,000 per rider new to mass transit? It would be cheaper to buy these 6,800 people new residences closer to their jobs.

The communities that will be impacted by this project, in whatever form it takes, will also undoubtedly be changed forever. As a frequent patron and supporter of the Capital Crescent Trail, I am disturbed by the potential impact a light rail line would have on this tract of parkland. MTA has provided many artists' renderings of what the trail would look like with the rail line, but has avoided the most glaring part of this equation: most of the trees and accompanying tree canopy would have to be removed to accommodate a large set of wires. The trail would be never be the same and would never be able to thrive as it does now.

Personally, I find MTA's comments about the trail highly disingenuous. The construction of the LRT alternatives will devastate the trail. It is clear that light rail and heavy forestation do not work well together. Ironically, today's *Baltimore Sun* reports that the northern half of the Baltimore light rail system has been shutdown indefinitely as falling leaves are creating unsafe conditions on the tracks. The *Sun* reports that this problem is on the section of the line that "follows a narrow, old railroad right of way along the Jones Falls Expressway through forested parkland." The same design problems exist here. To limit potential tree and leaf damage to both the overhead wires and tracks, MTA will have to continually trim the trees that border the right-of-way. A once green and enjoyable park facility will be irreparably destroyed. While this point alone may not be reason enough to stop the LRT or BRT alternatives, the government should be upfront with its citizens about the impact of this decision. Trivializing the impacts along the trail has done immeasurable harm to the reputation of this proposed project.

Beyond today's operating problems caused by leaves, MTA has a checkered history planning and operating light rail. The Baltimore system, after nearly 20 years of operation, has realized less than half of the ridership MTA estimated during construction. The light rail line has become a money pit with the state having to subsidize roughly 75% of its operating costs. The MTA Administrator during the Glendening Administration once testified that he would close it if it were not for the capital costs already sunk in it. The Baltimore light rail line does not attract riders because it is not interchangeable with the pre-existing heavy rail line and moves slowly along city streets. Yet, MTA is proposing making the same billion dollar mistake again. Light rail is not currently a part of the highly successful Washington Metro system. LRT will require new cars, new maintenance facilities, and new mechanics that can never be integrated with our existing system unlike the new rail extension currently under

construction in Northern Virginia. And, in many places along the proposed LRT alignment, the trains will be slowed by operation on roads. This will not be an effective or efficient use of federal, state, or local taxpayers' money.

With little chance to expand on the current heavy rail system, I think it is clear that buses are the future of transit expansion in this metropolitan region. While the state includes new and denser development as a potential benefit of the LRT alternatives, there is no guarantee any of this development would occur. Decades after opening, many of the existing Metro stations lack new or dense development. Building it will not, as they say, ensure that "they will come."

Greatly improved and expanded bus service will best serve the development and commuter patterns of our region. On this point I would note that the TSM alternative provides more than a third of the benefit with less than a tenth of the cost of the high investment LRT. For decades we have overlooked and under-invested in bus transit in our region. With roughly half of the cost of the state's share in the LRT alternatives, we could probably divert more single occupancy vehicle (SOV) trips than estimated in the DEIS. My colleagues and I have focused too much time and attention on high-profile potential rail projects and not enough on sensible bus improvements. An investment in new vehicles and new technology could makes buses much more attractive to commuters. We need to expand bus transit into less dense existing and growing communities outside the Beltway more than we need to sink billions into transit to support a dreamlike vision of future high-density communities.

In the headquarters of the Baltimore Jewish Charities is a sign proclaiming "Our parents built for us; we build for our children." This sentiment briefly but profoundly summarizes the feelings most of us have about our wonderful community and region. We were granted a world-class subway system by our farsighted "parents"- the leaders and activists of the 1950's, 60's and 70's. We now wish to leave our children with a similar legacy. While many understandably believe this Purple Line proposal is worthy of this goal, I believe it has too many shortcomings, too many unanswered questions, and too many optimistic assumptions to move forward. In the end, I fear its only legacy will be yet one more unpaid bill left to our children. Instead, we should leave them a flexible, efficient, user-friendly, and affordable bus network that can more easily adjust to future needs and challenges.

- RECORD #1213 DETAIL

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Submission Content/Notes : Delegate Heather Mizeur, H-E-A-T-H-E-R, M-I-Z-E-U-R. Good afternoon and thank you for the
opportunity to provide this brief testimony. I come
before you first and foremost as a state delegate
representing many of the neighborhoods that would be
served by the purple line. But I also come before you as a resident of Takoma Park and a small business owner in downtown Silver Spring.

Wearing all three of these hats at once, I believe strongly that it is time to build the purple line and that we should choose light rail over buses.

The purple line will be a major investment for mobility in our inner suburbs. Together with other plan transit enhancements in Washington, DC and Virginia, it will continue to strengthen and bring together communities in our metropolitan region.

The benefits of a light rail purple line are as numerous as they are convincing. By linking three Marc commuter rail lines with Metro's green line, orange line and both legs of the red line, the purple line will improve the utility and value of our existing transit assets. By providing an alternative to driving, it will help alleviate traffic, reduce our reliance on imported oil and lessen the environmental impact of our trips.

By bringing together major population centers, residential areas, business districts, recreational facilities and educational institutions, the purple line will open possibilities for everyone in our communities and give us options. Where to live, where to work, where to study, where to eat and where to play.

If we build the purple line as a reliable and fast light rail line, the Maryland Transit Administration estimates that as many as 68,000 daily trips could be made. That's 68,000 people telling us, if you build it, we will ride.

There is a reason to believe that these may be conservative estimates. Despite a temporary respite from $4 gas, most energy experts anticipate that Marylanders will once again face extremely high prices at the pump.

After decades of endless road building, we have finally learned that we cannot sprawl our way out of traffic and both demographic trends and changing consumer taste suggests that there is an unsatisfied demand for walkable communities served by transit.

It is time to build the purple line. We are at a unique moment. Commuters are more ready now to leave their cars at home and take transit than at any time since World War II. The morale imperative to do something about global climate change has convinced us that we can no longer conduct business as usual and President Elect Obama is expected to be more pro-transit than any President in recent history.

It is time to build the purple line. It is time to build it now.

As a state delegate representing some of the most transit dependent neighborhoods in Montgomery County, I know that my constituents need improved, faster and more reliable service. As a resident, I would love the opportunity to get over to the University of Maryland to more easily see our Lady Terrapins take to the basketball court.

As a small business owner, I want transit options that can get me and my employees to work and to meetings on time.

Whether it's revitalizing our communities, improving our transit network,

alleviating traffic or promoting economic development, we need to invest in east/west travel. A light rail purple line will bring us the best return on that investment. It's time to build the purple line and it's time to build it now. Thank you.

- RECORD #858 DETAIL

First Name :	Senator Paul
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Submission Content/Notes : Let me say a few words. Thank you for holding the hearing. I appreciate it and thanks for everyone coming out today.

When it comes to transportation we need not only change how we do business but we need to change how we get to business. And clearly, not having mass transportation makes it more difficult for people to get to work, to have more time to spend with their family.

As part of the culture change we need in the Metropolitan Area, we need to improve the east-west highway transportation. I have to get on the Beltway, as many people here do, we see numerous cars of one person traveling from east-to-west filling up the Beltway, polluting our air, emitting CO2 into the air, adding additional cost to the State and Federal Government for cleaning up that pollution and making it more difficult for our business owners to be able to rely on their workforce.

It makes economic sense, it makes environmental sense, and it follows through on the whole concept of Smart Growth, as you know so well. You need to have a transportation infrastructure where you have people and where you have businesses.

More specifically in terms of the Purple Line, it's going to benefit students from Montgomery County for example, coming to College Park where they don't have to get in their car. It's going to reduce the cost for building parking garages at the campus which is going to cost students money in their tuition. Its going to cost the State money.

It's going to increase, potentially, commercial development along Langley Park, the east-west corridor inside the Beltway. And also, more importantly, it's going to open up businesses in Prince George's County.

A lot of the transportation now is from east to west, I think if there is reliable transportation, a Purple Line, it's going to increase the opportunities for more businesses. Larger developments along Metro stops in New Carrollton, College Park, M Squared brings people from west-to-east as well which is going to increase the economic development for our own county here.

Years ago, 30 or 40 years ago, they decided not to put a Metro stop on the College Park Campus and we can discuss that. I don't know if they're here, they choose not to put a stop there. We think it was a bad decision.

Now College Park and the University of Maryland are on-board. We're still working the alignment, as you know and I think we're close. But I think they have to start making the right judgments now before it's too late.

I have looked at this every which way and there is no logical reason not to have the Purple Line as it is. Clearly there's opposition. You've got the Country Club set in Montgomery County who is afraid it's going to hurt the fairway of the 4th or 5th holes. That can be overlooked. I think we can deal with that.

The people in my District all say it's vital, it's important, it makes sense, I've been advocating for this for 15 years. I think it's the right thing to do. I strongly encourage the adoption of it so we can get in the queue with the Federal Government by springtime and get it funded.

Two small items in terms of the alignment. Getting more specific and I've shared this, coming from east-to-west, the Kenilworth Avenue area is a fairly major intersection between the east-west highway and Kenilworth

Avenue. I know initially there were two options.

One was tunneling, which is very expensive and one was at-grade which unfortunately, would add to the backup at that intersection. I've suggested to Michael and to the Secretary the idea of the flyover.

I know it might not be as aesthetically pleasing. There may be some frontage area on Kenilworth Avenue as it lies across but I think we all understand this is a very expensive project. The less tunneling we do the more likely it's going to pass and come to fruition.

At the same time, we don't want to inconvenience people. The idea of Mass Transit is to improve transportation. You don't want to make it a liability. So I've suggested and encouraged reviewing the concept of a flyover, heading west and then turning north onto Kenilworth Avenue.

As the State Senator who represents the 22nd District, which is the eastern most terminus from New Carrollton through Riverdale Park and Riverdale through Adelphi, I strongly support this. I encourage it.

There's still a few minor tweaks. We need to get everything aligned literally and figuratively as soon as possible. It's an expensive project, 1.5 billion. We're going to have to match it. We want to get on target and get that federal money as soon as possible.

So I hope you take this to the rest of the appropriate officials. And again thank you and the audience for participating and supporting this project. Thank you.

- RECORD #1218 DETAIL

First Name :	Senator Jamie
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Submission Content/Notes : Thank you very much. Jamie Raskin, J-A-M-I-E, Raskin, R-A-S-K-I-N. I'm the State Senator for Silver Spring and Takoma Park.

When I was a kid, the Metro was built and I remember the absolute thrill I experienced traveling on it, exploring parts of the community I had never seen before, getting to places on my own, visiting friends.

As I have gotten older, I have only come to appreciate more the extraordinary vision of the people and the public officials in the great society who had the foresight to see the demographic and economic changes that were headed our way and to prepare for them in advance.

We too need to show the vision and the courage to invest in the purple line rail option for ourselves and for future generations.

A great and vibrant metropolitan area like ours needs great public transportation. That means not only transit routes that connect towns and suburbs to the city core which is what the first designers of the Metro did, but transit routes that connect the suburbs and towns outside of this city to each other.

Much of our movement is people in this county and Prince Georges is east/west as well as north/south. It now takes a ridiculous amount of time on public transportation to get from Silver Spring or Takoma park to Bethesda on the Metro or from Bethesda to College park.

It makes no sense and it forces people back into their cars which makes our traffic situation surreal and undermines our efforts to fight global warming.

The purple line will connect us in Montgomery and Prince Georges, including the University of Maryland in a convenient way. It improves the speed of travel and reduces the enormous frustration that comes from endless traffic congestion.

Wouldn't it be a dramatic change to be able to get through Silver Spring to Bethesda in 10 minutes, from Bethesda to College park in just over a half hour?

The purple line offers us, it offers moms and dads and kids and college students a way to get out of their cars and out of the traffic and into neighborhood community and college activities without all the hassle and through an environmentally conscious mode of transportation.

After a period nationally in which not millions, not billions, but trillions of dollars have been squandered on aggressive war and on the seemingly never ending bailout of Wall Street, it is time to reinvest in America.

That means reinvesting in public things. The purple line represents for us here in Montgomery County a reinvestment in our common quality of life.

Ever since Rosa Parks stood up by sitting down and Dr. King led the Montgomery bus boycott, mass transit has been a civil rights issue. Today it is also an issue about the environment and our commitment to protect the quality of life for future generations.

Transportation projects of any type or size are complicated, but we have to fear for our future if we do nothing now to deal with extraordinary transportation pressures which are only getting worse.

The devil often lies in the details of course when we commit ourselves to

a transportation project and we should do everything that we reasonably can to mitigate the impact of construction on neighborhoods that are most directly affected.

Although the benefits of the new project will be widely shared and diffused among all of us, some of the burdens may be concentrated in relatively tiny numbers of people, so we must be certain to work carefully to accommodate the legitimate concerns that people have and to make the project as community friendly as we can.

But let us stand together and let us stand strongly for the purple line. It offers us the right way to increase our mobility, center our development and renew the quality of life in our communities for generations to come.

- RECORD #1186 DETAIL

First Name :	Senator Jim
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Submission Content/Notes : My first name is Jim and my last name is Rosapepe, R-O-S-A- P-E-P-E.

I'm the state senator who represents District 21 in which we are all here this evening. We appreciate your coming here for this presentation and for this hearing.

I know my colleague, Delegate Frush, spoke earlier. I'm here speaking on my own behalf as well as on behalf of my constituents and my colleagues in the delegation, Delegates Ben Barnes and Josh and Pena Millick.

This is an extremely important project for the region, but it is also an extremely important project for this district and this community.

Obviously since it will connect the green line with the circumferential route here in College Park, this is one ground zero for the purple line which is extremely important to the future of this community and to the future of the University of Maryland.

It's also important though for our constituents in Beltsville and Laurel because between Marc bus service green line, they will have access to much more cost effective and appropriate transportation when the purple line is built.

We understand that outside of College Park there are a number of route issues which are not within our jurisdiction. As everyone knows, there has been a significant alignment issue on the College Park campus which I gather is being resolved, very good work by the university and very good work by the MTA.

We want to make sure that that comes to fruition. We don't want any delay in moving forward on the purple line.

Last year during the legislative special session, the delegates and I made very clear that our support for the Governor's transportation package was conditioned on the state's continued support for moving ahead on the purple line.

The state share for the engineering phase in fact in the transportation, the six year budget despite the economic problems caused by the international financial crisis and by the speculative gyrations of gasoline prices this summer. Revenue has obviously gone down for the Transportation trust fund, but Governor O'Malley to his credit has stuck with the priority for the purple line which we all think is extremely important.

I would just say this, that there will be an inclination to say we can't take on big projects now. We can't move forward on long-term priorities because of the state's budget situation, because of the federal budget situation.

I would say exactly the reverse, that very frankly with President Elect Obama's commitment to restart this economy as well as his commitment to move forward on alternatives to imported oil and imported energy, the purple line should pick up momentum, not lose momentum over the next year.

The fact of the matter is that the federal commitment should increase, the federal government as part of its economic stimulus package should include significant investment in transportation.

When the federal government, as it should, passes a federal cap and

trade policy to fight global warming, a substantial piece of that should go towards mass transit for projects like the purple line.

The reality is the purple line is a job creator and an energy saver. On behalf of my constituents, I'm just here to very strongly support it. We want to get this show on the rails as soon as possible. Thank you very much.

- RECORD #2215 DETAIL

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Testimony Presented by
Del. Ana Sol-Gutiérrez, District 18, Maryland House of Delegates
Purple Line DEIS hearing – 11/18/08
National 4-H Youth Conference Center, 7900 Connecticut Avenue Chevy Chase, MD

For the record, my name is Ana Sol-Gutiérrez and I live at 3317 Turner Lane, Chevy Chase, MD 20815. I welcome you to my District! As a Delegate of District 18, which includes neighborhoods on both sides of our overburdened beltway, I am pleased to speak tonight in support of the Light Rail Purple Line.

As transportation needs and demands continue to grow in our metropolitan area, traffic congestion is harming District 18 in many ways. Let me summarize why the Purple Line is so important for my district and MoCo–

- It provides an efficient, environmentally friendly, east-west transportation connection that brings people and jobs together
- It takes pressure off roads and alleviates traffic congestion.
- It serves many, many people, including those who do not have a car, safely, efficiently, and reliably.
- It helps address many environmental problems, including air pollution and global warming.

I support the Light Rail alternative for several important reasons:

- ***The projected ridership for 2030 – 68,000 riders - is higher than the ridership for any bus rapid transit system in the U.S.*** We have not worked this hard for 20 years to build a system that will be obsolete 15 years after it is built! Light Rail Lines can carry 100,000 or more without any problem or additional costs.
- Light Rail is more compatible with the Georgetown Branch hiker biker trail which should be completed into Silver Spring as part of this project. My constituents have waited too long for this trail to be finished as it has been westward from Bethesda for more than a decade. I grew up with the freight trains on this right of way; they were loud and primarily carried freight, not people. Light rail trains are quiet and non-polluting so they will not disturb adjoining homeowners or the thousands of users of the trail. I am very pleased to hear that the Washington Area Bicyclist Association has taken a position in support of light rail for this reason.
- Light rail has a great record in fostering sensible, pedestrian-friendly development. While our district is doing well in this regard, it is important in times of economic downturn for us to build green infrastructure that will create jobs near our residential communities who need them including Long Branch and Takoma-Langley crossroads.

I cross our county many times during the week and can see every day the growing need for the light rail Purple Line. If we do not build this, families, businesses and communities will suffer as the beltway breaks down and traffic pours through every secondary road in our neighborhoods.

Purple is the color of unity. So if Montgomery County is completely united with Prince George's County, we can see construction start on this tremendous project in 2012. We can witness our fellow citizens riding the quiet, efficiennon-polluting light rail trains in 2015.

IF we are united. IF we are ready to work hard to overcome odds.

We have a great new President coming into office who is fond of saying YES WE CAN! Or as we say in Spanish: Si se puede!

Yes --we can rebuild our communities that need it. Si se puede!
Yes --we can rebuild a new and greener infrastructure for the future. Si se puede!
Yes -- we can counter global warming by reducing out dependency on fossil fuels.
Yes -- we can break down the barriers between our counties by strengthening the ties between them with the Purple Line.

Yes we can, and yes we will!

Thank you.

- RECORD #1322 DETAIL

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Submission Content/Notes : My name's Scott Tsikerdanos, and I'm here on behalf of my boss, Senator Richard Matalino. I'll spell my name, S-C-O-T-T, T- S-I-K-E-R-D-A-N-O-S. He's actually at a hearing this evening and coincidentally, they're actually hearing about the drop in transportation revenues that support state programs. They are currently reporting that the 6 year transportation revenue forecast is overstated by 2.5 billion dollars or roughly percent. So, here is his statement. During the course of my 20 years in and around the General Assembly, I have seen and heard all of the arguments for and against the Purple Line. After many years of discussion, planning and community outreach, I still have very serious reservations about this project, from a fiscal standpoint, from an operational standpoint, and with regards to the effects it will have on the communities in our region.

Quite frankly, the state does not have the resources to pay for any of the bus rapid transit or light rail transit options. Over the past decade, the only major new construction projects the state has moved forward with have been funded primarily with toll-backed revenue bonds. There are no alternative funding mechanisms available for this project.

As a member of the Senate Budget and Taxation Committee, I feel confident in reporting that no new revenue options appear politically feasible in the foreseeable future.

Because there are, at best, limited state funds available for this project, the DEIS assumes a local contribution but does not suggest what shape or size that it may be. I think it is irresponsible for the state to propose this project without informing either local county government of what its share might be.

I would also note that no local government in the Baltimore region has been asked to make a direct contribution towards the construction or maintenance of their light rail system. Questions about the state's ability to pay a loan should prevent the Federal Transit Administration from allowing this project to move forward.

The communities that will be impacted by this project, in whatever form it takes, will also undoubtably be changed forever. As a frequent patron and supporter of the Capitol Crescent Trail, I am disturbed by the potential impact the light rail line would have on this tract of park land.

MTA has provided many artists renderings of what the trail would look like with the rail-line but has avoided the most glaring part of this equation. Most of the trees and the accompanying tree canopy would have to be removed to accommodate a large set of wires. The trail would never be the same and would never be able to thrive as it does now.

Personally, I find MTA's comments about the trail highly disingenuous. The construction of the LRT alternatives would devastate the trail. It is clear that light rail and heave forestation do not work well together.

Ironically, today's Baltimore Sun reports that the northern half of the Baltimore light rail system has been shut down indefinitely, as fallen leaves are creating unsafe conditions on the tracks. The Sun reports that this problem is on the section of the trail that "follows a narrow, old railroad right-of-way along the Jones Fall Expressway through forested parkland". The same design problems exist here.

To limit potential tree and leaf damage to both the overhead wires and tracks, MTA will have to continually trim the trees that border the right-of-way. A once green and enjoyable park facility will be irreparably

destroyed.

While this point alone may not be reason enough to stop the LRT or BRT alternatives, the government should be up front with the citizens about the impact of this decision. Trivializing the impacts along the trail has done immeasurable harm to the reputation of this proposed project.

With little chance to expand on the current heavy rail system, I think it is clear that buses are the future of transit expansion in this metropolitan region. While the state includes new and denser development as a potential benefit of the LRT alternatives, there's no guarantee any of this development would occur. Decades after opening, many of the existing metro stations lack new or dense development. Building it will not, as they say, ensure that they will come.

Greatly improved and expanded bus service will best serve the development and commuter patterns of our region. On this point, I would note that the TSM alternative provides more than a third of the benefit with less than a tenth of the cost of the high investment LRT.

For decades, we have overlooked and under-invested in bus transit in our region. With roughly half of the cost of the state share and the LRT alternatives, we can probably divert more single occupancy vehicle trips than estimated in the DEIS.

My colleagues and I have focused too much time and attention on high profile potential rail projects and not enough on sensible bus improvements. An investment in new vehicles and new technology can make buses much more attractive to commuters. We need to expand bus transit into less dense existing and growing communities outside the beltway more than we need to sink billions into transit to support a dream-like vision of future high density communities.

In the headquarters of the Baltimore Jewish charities is a sign proclaiming: our parents built for us, we build for our children. This sentiment briefly but profoundly summarizes the feelings most of us have about our wonderful community and region. We were granted a world class subway system by our farsighted parents, the leaders and activists of the 1950's, 60's and 70's. We now wish to leave our children with a similar legacy. While many understandably believe this Purple Line proposal is worthy of this goal, I believe it has too many shortcomings, too many unanswered questions, and too many optimistic assumptions to move forward. In the end I fear its only legacy will be at one more unpaid bill left to our children. Instead, we should leave them a flexible, efficient, user-friendly and affordable bus network that can more easily adjust to future needs and challenges. Thank you.

- RECORD #2113 DETAIL

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I. Introduction

When it comes to the Purple Line, I am where I have always been: I remain a loyal friend of the Capital Crescent Trail. I strongly support a Purple Line that leaves the trail unmolested and retains both its utility and majesty.

Most of the comments to this DEIS have discussed the substantive merits of the various alignments. I emphatically join the comments of my colleagues Del. Al Carr and Sen. Rich Madaleno. Their preferred alignment is also mine. I write separately, however, because transportation dollars generally, and transit dollars specifically, are scarce and finite. To comment on the Purple Line in a vacuum is to do a disservice to my constituents and the people of Maryland. Instead, these comments take a comparative view.

II. Transit Goals

Just as Abraham Maslow created a hierarchy of needs, so too must we enumerate our shared values when it comes to comparing transit projects in a finite funding environment. What do we want transit to do? What are the environmental goals? The social goals? If we had to list those goals, what order would they take?

Transit provides enormous benefits to our community. It promotes walkable communities, enhances our shared sense of togetherness, and provides the less-fortunate a

reliable and inexpensive way to get to work. Transit is an antidote to sprawl, a counterforce to six-lane highways, and a curative to the curse of SOVs.

But in these historic times, multiple transit alternatives often compete for diminishing resources. How should we judge if one project will better promote transit-oriented development while its competitor will better serve underprivileged communities? How should we judge if one project will better curb sprawl while its competitor will move folks faster?

III. The Critical Need to Reduce SOVs

My answer is simple. The most important thing transit can achieve—more important than its tremendous social benefit, more important than its other environmental benefits—is to reduce the scourge of single-occupant vehicles. The climate is quickly warming, and we've lost eight years of progress to a war on science, a war on the obvious. Policymakers must move quickly to dramatically reduce carbon emissions, much of which come from the tailpipes of automobiles[1]. Our most critical need at this most critical time is getting cars of the road. More than any other environmental solution, reducing SOVs clears our air, reduces global warming, preserves open space, and improves our quality of life.

If we are to compare transit facilities in a budget environment the likes of which we have never seen, we must first build the facility that eliminates more SOVs.

IV. A Startling Statistic

The DEIS is a comprehensive, statistic-laden document. Within it lies the most startling statistic of all. **If the Purple Line runs along the Capital Crescent Trail, 70% of riders will**

[1] According to the Environmental Protection Agency, the average car emits 575 pounds of carbon monoxide, 38.2 pounds of nitrogen, 11,450 pounds of carbon dioxide, and 77.1 pounds of other hydrocarbons per annum. The average SUV or pick-up truck (aka light truck) emits 854 pounds of carbon monoxide, 55.8 pounds of nitrogen, 16,035 pounds of carbon dioxide, and 108 pounds of other hydrocarbons per annum. Because, again according to the EPA, about half the U.S. fleet is light trucks and half is cars, the average U.S. vehicle thus emits 715 pounds of carbon monoxide, 47 pounds of nitrogen, 13,753 pounds of carbon dioxide, and 93 pounds of other hydrocarbons per annum.

simply be switching from other modes of transit. In other words, less than a third of all Purple Line riders will be coming from SOVs. This is a dramatic number, one that hasn't been picked up by the advocates of either side. The startling nature of this statistic cannot be overstated as we forge headlong into our decision-making.

Now let's look at the Corridor Cities Transitway, the Purple Line's primary competitor for funding. The CCT is a proposed transit corridor along I-270, designed to take cars of that road and better connect the upcounty area to the western half of Metro's Red Line via Shady Grove. The result is another dramatic number, but dramatic in the opposite direction. In contrast to the Purple Line, the Corridor Cities Transitway DEIS indicates that almost 90% of riders will be new to transit.[2]

In other words, the Corridor Cities Transitway has a 60 percentage point advantage over the Purple Line when it comes to reducing SOVs. This is an incredibly significant difference, as every SOV taken off our road reduces our carbon footprint and helps clear our air.

Conclusion

In a budget environment limited by historic circumstances beyond our control, we must closely compare projects to maximize environmental benefits and minimize SOVs. I strongly support a Purple Line that leaves the Capital Crescent Trail untouched. But looked upon comparatively, it's clear the Corridor Cities Transitway is the most beneficial project when it comes to reducing global climate change and taking cars off our roads.

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[2] To be clear, this number includes folks who *drive* to the Shady Grove Metro station. In other words, the statistic is accurate because it includes car drivers who drive the proposed corridor, despite the fact that they are driving the corridor to access other transit.